Senior Agency Official for Records Management
FY 2015 Annual Report

The *Managing Government Records Directive (M-12-18)* requires Senior Agency Officials (SAOs) for Records Management to provide an annual report to NARA. This report demonstrates how your organization is achieving the goals of the *Directive* and other important initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the Federal Government in meeting the goals of the *Directive*, including implementing proper email management and transitioning to electronic recordkeeping. Additionally, NARA uses the report for information sharing purposes to provide best practices and model solutions with Federal agencies.

The reporting period begins on November 16, 2015, and reports are due back to NARA no later than COB January 29, 2016.

Please note that NARA will post a version of your 2015 SAO report on the NARA website. This action is in the interest of transparency in Government and to promote collaboration and communication among agencies. Please let us know whether there is a specific justification as to why your report cannot be publicly shared (in whole or in part).

Instructions for Reporting

- This template covers progress through fiscal year (FY) 2015.

- Please be brief and precise in your answers. Limit answers to each question to no more than 500 words.

- Please complete the eight questions/items on the following pages and send the report to prmd@nara.gov. Include the words "SAO annual report" and your agency's 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):

Name of SAO: Ann Dunkin

Position title: Chief Information Officer

Address: 1200 Pennsylvania Avenue, NW, Washington, DC 20460

Office telephone number: 202-564-6404

1. What are the agencies, components, or bureaus covered by this report and your position as SAO?

> *Please list them below:*
> Environmental Protection Agency (EPA)
> Ann Dunkin
> Chief Information Officer, Office of Environmental Information

2. Is your agency going to meet the *Directive* goal to manage all <u>email</u> records in an accessible electronic format by December 31, 2016? *(Directive Goal 1.2)*

<p style="text-align:center;">☒ Yes   ☐ No</p>

> 2a) *Provide a list of actions your agency, components, or bureaus have taken to meet this goal. Include specific information on your <u>progress</u> regarding:*
>
> - *establishing formally approved email policies,*
> - *use of any automated systems for capturing email,*
> - *providing access/retrievability of your email,*
> - *establishing disposition practices for agency email (either destroy in agency or transfer to NARA), and*
> - *possible implementation of the Capstone approach for applicable agency email.*
>
> The EPA's revised Records Management Policy (CIO 2155.3) was issued on February 10, 2015. In this policy, EPA strongly discourages the use of personal email or other personal electronic messaging systems, including text messaging on a personal mobile device, for sending or receiving Agency records, but to the extent such use occurs, the individual creating or sending the record from a non-EPA electronic messaging system must copy their EPA email account at the time of transmission or forward that record to their EPA email account within 20 days of creation or sending.

EPA procured, installed and configured a Documentum records repository infrastructure and developed and deployed the EZ Email Records tool. The EZ Email Records tool was officially launched on November 25, 2013, to allow all EPA staff to identify appropriate emails as records. EZ Email Records provides a streamlined, one-click, records declaration. Declared email records are transferred from both the legacy Lotus Notes email system and the current Microsoft Outlook/Exchange Online email system to the Documentum records repository, where the records can be searched and retrieved using a search tool. EPA provided a demonstration to the National Archives and Records Administration (NARA) representatives on the tool during Fiscal Year 2014.

All email records that have been captured by the EZ Email Records tool are being stored within the Documentum records repository and are currently being treated as "permanent" records until an auto-categorization solution is deployed. The auto-categorization solution will apply the appropriate schedule/retention to email records that have been captured in the Documentum repository. EPA completed market research and proof of concept testing on records auto-categorization software during Fiscal Year 2014. EPA procured the Recommind Axcelerate auto-categorization software in Fiscal Year 2015 and installed the software in EPA's Documentum development environment on November 13, 2015.

2b)   *Provide a list of the actions your agency, components, or bureaus plan to take in 2016 to meet this goal.*

In FY 2016, EPA will be working to validate and configure the autocategorization software to work in EPA's Documentum environment, in preparation for deploying it to EPA's production environment. Once the autocategorization tool has been deployed, records management specialists will assist in ensuring that records are properly categorized.

EPA is also considering other potential approaches to facilitate email records management, such as Capstone and other automated approaches, but final decisions have not yet been made.

3. Has your agency taken actions to implement the 2014 amendments to the *Federal Records Act* requiring Federal employees to copy or forward electronic messages (including email, texts, chats, and instant messaging) that are federal records from their non-official accounts to official accounts within 20 days?

☒ Yes   ☐ No

Please provide a brief description of the actions taken, such as establishing policies and providing training.

While EPA's Records Management Policy has always noted that records can be created in any format, the policy was revised to emphasize text messages as one of those formats. All Senior Officials are briefed by the Agency Records Officer or their Records Liaison Officer (RLO) and it is made clear that the creation of a record is based on the content of the information, not the format. EPA has a guidance document and an FAQ for saving records from mobile devices. This information is communicated to staff by Records Alerts, Quarterly Records Management Days, the Agency's records management website and Records Management Training. In addition, the Agency developed a checklist for Separating and Transferring Personnel that reminds EPA personnel of all the locations and media where records may be located. EPA personnel are required to complete this form and save their records into an Agency Recordkeeping System before they transfer or leave the Agency. They must also have the form signed by their supervisor and RLO.

EPA revised its records policy to include the following language in addition to sending an alert to the records network and posting the information on the Intranet:

"EPA strongly discourages the use of personal email or other personal electronic messaging systems, including text messaging on a personal mobile device, for sending or receiving Agency records, but to the extent such use occurs, the individual creating or sending the record from a non-EPA electronic messaging system must copy their EPA email account at the time of transmission or forward that record to their EPA email account within 20 days of creation or sending and it must be saved as a record using EZ Email Records, or another approved recordkeeping system."

In addition, EPA's National Records Management Program (NRMP) worked with the Office of Technology Operations and Planning (OTOP) and the Office of General Counsel (OGC) to develop specific instructions for EPA personnel and contractors on how to forward text messages that are records, to their EPA email account.

4. Describe your agency's internal controls for managing electronic messages (including email, texts, chats, and instant messaging) of the agency head and other executives (including appropriate advisers, and other senior management staff).

While EPA's Records Policy has always noted that records can be created in any format, the policy was revised to emphasize text messages as one of those formats. All Senior Officials are briefed by the Agency Records Officer or their RLO and it is made clear that the creation of a record is based on the content of the information, not the format. EPA has a guidance document and an FAQ for saving records from mobile devices. This information is communicated to all personnel, including senior officials, by Records Alerts, Quarterly Records Management Days, mandatory Records Management Training and the Agency's Records Management website.

In addition, the Agency developed a checklist for Separating and Transferring Personnel that reminds EPA personnel of all the locations and media where records may be located. EPA personnel are required to complete this form and save the records into an Agency Recordkeeping System before they transfer or leave the Agency. They must also have the form signed by their supervisor and RLO. Senior Officials' checklists must be signed by their respective Information Management Officials (IMOs) before they leave the Agency to ensure that all records are captured into a recordkeeping system or turned over to successors.

5. Is your agency going to meet the *Directive* goal to submit records schedules to NARA for all existing paper and other non-electronic records by December 31, 2016? *(Directive Goal 2.5)*

☒ Yes ☐ No

5a) *Provide a list of the actions your agency, components, or bureaus have taken to meet this goal.*

NRMP constantly reviews and updates its records schedules for paper and other non-electronic records, as well as electronic information systems. In 2011, the Agency began an effort to consolidate its schedules to reduce the number of schedule items, in part, to simplify records management for the end user and reduce the number of retention policies to manage in the electronic record keeping system. EPA developed and submitted 23 consolidated records schedules to NARA for approval. To date NARA has approved 18 of those records schedules and 5 are waiting approval.

The Agency will also monitor the Registry of EPA Applications, Models and Databases (READ) for electronic information systems. READ is EPA's inventory of information resources, and NRMP reviews the entries on a regular basis to determine if there are new systems that need to be appraised for records schedule purposes. If a records schedule has already been identified for a system, NRMP verifies that the records schedule information is correct and, if not, works with the program office to identify the correct schedule or develop a new one, to be submitted to NARA for approval.
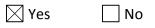
EPA has RLOs in each program office and region. One of their responsibilities is to work with the leaders of all new projects and initiatives to ensure that a records schedule exists to cover any new records series and/or work with NRMP to develop an appropriate records schedule that applies to the records.

5b) *Provide a list of the actions your agency, components, or bureaus plan to take in the future to meet this goal.*

EPA will continue to respond to questions and comments from NARA on the remaining consolidated schedules. The Agency will continue to monitor READ and work with

system owners, program managers and RLOs to identify new records series and develop appropriate records schedules as soon as possible.

6. Is your agency going to meet the *Directive* goal to manage all <u>permanent</u> electronic records in an electronic format by December 31, 2019? *(Directive Goal 1.1)*

$\boxtimes$ Yes ☐ No

6a) *Provide a list of the actions your agency, components, or bureaus <u>have taken</u> to meet this goal. Include specific information on your <u>progress</u> regarding:*

- *establishing formally approved electronic records policies,*
- *use of any automated systems for capturing electronic records,*
- *providing access/retrievability of your electronic records, and*
- *establishing disposition practices for agency electronic records.*

EPA system owners will continue to work with NRMP to transfer permanent electronic records directly from EPA systems to NARA once files are closed. EPA procured, installed and configured a Documentum records repository infrastructure, and has built applications and system-to-system connections to capture certain types of electronic records.

EPA worked with the Agency Records Community to develop and collect a set of performance metrics for electronic records. These metrics will assist EPA in monitoring progress towards meeting the 2019 goal. These metrics, such as the number of records saved using EZ Email Records each week, are used by the RLOs to track progress in their respective programs or regions. A search tool in the Agency's Enterprise Content Management System (ECMS) allows users to locate and retrieve records of interest.

6b) *Provide a list of the actions your agency, components, or bureaus <u>plan to take</u> in the future to meet this goal.*

The NRMP plans to work with EPA program and regional offices to identify business processes requiring electronic records management capabilities and provide guidance for managing electronic records as needed.

EPA is developing an EZ Desktop Records tool to save non-email electronic records into ECMS. EPA has purchased the tool and is now piloting it on a limited basis.
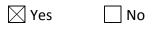
EPA is investigating the extent to which existing information systems can be enhanced to meet official records management requirements, while also

having the ability to transfer Agency records from such systems into an official enterprise records management repository.

7. Please provide any insight to your agency's efforts to implement the *Managing Government Records Directive* and the transition to a digital government.

Provide a brief description, including any positive or negative outcomes, challenges, and other obstacles.

EPA developed and distributed digitization standards and procedures Agency-wide in 2015. We are working with programs and regions to implement standards and procedures Agency-wide. The Agency is discussing the development of a front-end process to ensure consistency of digitization efforts across the Agency. EPA is currently exploring how to be store such digitized documents and ensure their transfer to ECMS.

8. With regard to records management, is your agency preparing for the upcoming change in Presidential administration?

☒ Yes ☐ No

8a) *Provide a list of the actions your agency, components, or bureaus have taken to ensure records of departing senior officials will be appropriately managed during the upcoming change in Presidential administration.*

To follow federal record-keeping requirements for maintaining and disposing of Agency records during Administration transitions or before senior officials leave EPA, the Chief Information Officer (CIO) will send out a memo to remind all EPA senior officials to work closely with administrative staff, if applicable, and RLOs to transfer custody of Agency records to others before they depart from the Agency.

EPA developed Procedures for Separating, Transferring or Separated Personnel along with a Records Management Checklist, EPA 3110-49. The purpose of the procedures and the checklist is to ensure that all of the employee's records are identified and transferred to an official recordkeeping system and access granted to their supervisor, successor, or RLO before departing from the Agency or transferring to another office within the Agency.

EPA has begun giving records management briefings to all of the political appointees that may be leaving the Agency as a result of the change in the Administration. The purpose of the briefing is to thank the political appointees for their public service, to reiterate the importance of their records and to ensure that all records created or received during their tenure are captured into an Agency recordkeeping system before leaving EPA. In addition, the political appointees are

reminded of any litigation holds or Freedom of Information Act (FOIA) requests to which they are subject, to ensure that all responsive records are identified and captured into the appropriate repository, or managed in place, when required.

8b)   *Provide a list of the actions your agency, components, or bureaus <u>plan to take</u> in the future to ensure records of departing senior officials will be appropriately managed during the upcoming change in Presidential administration, including ensuring that federal records are not improperly removed from the agency.*

Before leaving the Agency, senior officials will designate a staff person to assist them with the review and transfer of their hard copy and email files that will be maintained by EPA and later transferred to the NARA, when appropriate.

The Agency is also working with NARA's appraisal archivist throughout the review and approval process of EPA's consolidated records schedule for senior officials. NARA is in the process of reviewing the content, organization, and management of records created and received by some of EPA's designated senior officials, through the Agency's Correspondence Management System (CMS) to determine whether their records have sufficient value to warrant permanent retention.