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):

- Name of SAORM

Howard Spira

- Position title

Senior Vice President / Chief Information Officer (CIO)

- Address

811 Vermont Ave., NW, Washington, DC 20571

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:*

EXIM Information and Records Management

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:*

**YES** - As part of the Electronic Records Management (ERM) Program, and in compliance with the 2012 Presidential Directive for Federal Records, the Bank implemented three modules of the ERM: Board of Directors Archives System (BDAS), Permanent Email Archives System (PEAS), and the Permanent Records Archives System (PRAS). All three components of ERM use the OpenText Document capabilities for the archival implementation. All components are in production. All application components of the ERM will implement the Records Management lifecycle using the capabilities of the OpenText Records Manager (RM) and Retention Policy Services (RPS). This capability will be in production with the customized policies for each of the EXIM permanent records types before December 31, 2019.

In calendar year 2020, the Records Management specialized ERM system will begin the lifecycle maintenance phase, encompassing annual permanent records ingest, records management for format currency, and records integrity audits, as well as development and test of the capability to transfer permanent records to NARA's physical custody.

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
☐ N o

_Please explain your response:_

EXIM Records Management Program aligns its implementation with the criteria and requirements published by NARA. Specifically, the following key aspects enumerated in the Criteria for Successfully Managing Permanent Electronic Records (March 2018) document are addressed by the Records Management Program:

**Records Management Policy:** EXIM's Records Management Policy states the requirements for handling of records, including permanent electronic records. The combination of EXIM's File Plans and established operating procedures fully control the process of management of permanent electronic records. Annual and additionally, as-needed, training educates the entire agency staff who create, receive, access, or use Federal records, on their responsibilities for managing all electronic records.

The standing records management Policy has been developed with participation of all relevant stakeholders and ROL to address the requirements of the Federal Records Act (FRA), 36 CFR Chapter XII Subchapter B, and other relevant guidance issued by NARA and OMB, such as OMB Circular A-130.

**Systems:** EXIM permanent records comprise a small percentage of the total volume of agency records. After 2015, nearly all EXIM permanent records are created and maintained in electronic formats, consisting overwhelmingly of Microsoft Office application formats, PDFs, and email. All permanent electronic records types are inventoried in the applicable File Plans and reside in the specified Central Records Repositories for active records, such as shared drives and SharePoint application. These records are captured on an annual basis for long-term archival preservation in dedicated Electronic Permanent Records Management System (EPRMS). In the exceptional cases when permanent records are paper, they are scanned to an electronic PDF format for ingest to EPRMS per operating procedure. Capstone email is captured directly from Outlook accounts. EPRMS preserves EXIMS's permanent electronic records until their transfer to NARA in NARA-accepted electronic formats. Format conversion over time and periodic accessibility and integrity audits of long-term archived permanent records is implemented via a combination of EPRMS functionality and Standard Operating Procedures.

**Access:** Initial access to permanent electronic records while in active use is restricted to the personnel that require such access. At the two year point after the year of record creation, all permanent records are ingested for long-term preservation in EXIM EPRMS, which further protects them against unauthorized access, use, alteration, alienation, or deletion. The owner-originators of the records retain the secondary copy of their records for reference purposes and the records remain searchable, retrievable, and usable while active. EPRMS provides additional (secondary) assurance of the capacity to search and retrieve these records until their transfer from EXIM custody to NARA.

**Disposition:** EXIM follows the mandatory instructions contained in the applicable records schedules pertaining to the transfer of its permanent electronic records to NARA's legal custody. EXIM is operating with a comprehensive set of NARA approved records schedules. While no electronic permanent

records were ready for transfer to NARA per specified disposition, EXIM is preparing to transfer permanent electronic records to NARA in acceptable formats and with the appropriate metadata.

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
   ☐ N o

   *Please explain your response (include specific goals and example metrics):*

The annotated Briefing Materials of EXIM's Chairman (term 2009-2015), that are permanent record have been digitized.

All other hard copy permanent records created prior to approval of the Bank's media neutral records schedule in FY2015 will not be digitized and will be accessioned to NARA as paper. The volume of the permanent records generated and managed by the Bank is small compared to the overall records volume.

Beginning in FY2015, all permanent records of the Bank are managed in electronic formats. A dedicated Documentum-based Electronic Records Archives is now used for the lifecycle management of all permanent records created after the approval of EXIM's media neutral records schedule in FY2015.

5. **Is your agency utilizing** General Service Administration's Schedule 36 **to procure solutions to assist in transitioning to an Electronic Environment?**

   ☐ Y es
   ■ No

   *Please explain your response:*

   *EXIM Electronic Records Management solution for permanent records, Electronic Permanent Records Management System (EPRMS) has been designed and implemented based on software that EXIM already had licensed.*

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:*

See EXIM's 2017 report. The RM briefing materials for senior officials is reviewed annually to ensure the content is current.

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 SAORM advocates for the records management program ensuring that adequate resources are embedded into the agency's Strategic plan.
1) EXIM Senior Agency Official for Records Management (SAORM) carries the overall agency-wide responsibility for records management resources and the implementation of records management initiatives focused on meeting the next milestone of the presidential Directive for the FY2019;
2) EXIM has in place Records Management Program, directing the agency's Records Management activities;
3) By December of 2019 EXIM will accomplish the full-scope implementation of the agency's electronic records in accordance with Government-wide requirements. All components of the ERMS for the management of permanent electronic records, including permanent email records are in production. The full Records Management lifecycle capabilities of the OpenText Records Manager (RM) and Retention Policy Services (RPS) will be in production with the customized policies for each of the EXIM permanent records types before December 31, 2019.
4) EXIM ensures the ability to access, retrieve, and manage federal records throughout their life cycle regardless of form or medium:

a) The existing paper records reside at the Federal Records Centers (EXIM's Permanent paper records) and the Iron Mountain records centers (EXIM's Temporary paper records);

b) EXIM electronic records are stored in the electronic records systems, as applicable.

5) Agency's records are treated as information resources with appropriate considerations of information security, privacy, records management, public transparency, and supply chain security issues throughout the records lifecycle from creation to disposition.

EXIM supports the transition to electronic government, by allowing individuals or entities that deal with the agency the option to submit information or transact with EXIM electronically, when practicable, and to maintain records electronically to the greatest extent feasible within operational and business practices constraints. Currently there are multiple Technology projects to modernize IT system.

6) EXIM had, in a timely fashion, established and obtained the approval of the Archivist of the United States for retention schedules for Federal records – all records of the Bank are scheduled. The standing retention schedules are reviewed annually to ensure that these schedules are current and adequate for the Bank's records management. As an example, the Bank recently requested and received approval of the Archivist of the United Stated for two stand-alone Records Schedules - the records of the Inspector General Office in FY2016, and ICRAS Reports in FY2017, both hitherto were scheduled within the Bank's comprehensive Records Schedule DAA-0275-2014-00.

7) EXIM diligently ensures the proper and timely disposition of Federal records in accordance with the applicable approved retention schedules. EXIM's File Plans are reviewed annually to ensure appropriate records disposition.

8) EXIM is committed to providing training and guidance to all agency employees and contractors regarding their Federal records management responsibilities. All Bank staff, federal and contractor, receives annual general records management training. The training materials are reviewed and updated annually. The Records Liaison officers receive annual specialized training and additional training and consultations as needed. New staff, including congressional appointees, receive new employee training within 30 days of coming on-board.

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:*

EXIM is committed to providing training and guidance, as appropriate, to all agency employees and contractors regarding their Federal records management responsibilities. All Bank staff, federal and contractor, receives annual general records management training. The Records Liaison officers receive annual specialized training and additional training and consultations as needed. New staff, including congressional appointees, receive new employee training within 30 days of coming on-board. Senior and executive Officials also receive a targeted specialized records management training at the time of coming on-board. Training materials in every category are reviewed and updated annually.

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:*

With direction from SAORM, EXIM's Records Management has pursued a phased approach to evaluation and auditing of the agency-wide implementation of the records management directives, policies, procedures, and retention schedules.

The initial phase, now complete, was to ensure that the team of Records Liaison Officers (RLOs) is comprehensively representing all agency divisions. RLO assignments are adjusted as needed when personnel or business organizations change. RLOs serve as an interface between their business teams and Records Management. Each year RLOs receive annual small group or in-person training that is targeting their Records Management responsibilities with respect to their specific business areas within the agency. That training is provided in addition to the all-staff annual RM training.

In the second implementation phase, also complete, the RLOs in collaboration with their business teams and Records Management staff, created or updated, as needed, the applicable File Plans for each business area of the agency. The standing File Plans are now reviewed and updated annually to maintain currency.

In current, third and final, implementation phase, Records Management division relies on the RLOs support in the execution of the evaluation and auditing. Annually, a selected group of RLOs perform a Records Management audit of their respective business team members. At least 30% of the team members are audited by each RLO. An audit item list is created annually to address the current Records Management concerns and assess the overall implementation of the Federal Records Management in the agency. The audit results are returned to the Records Management division. The audit verifies the team members' understanding of their File Plan and compliance with the records handling and records disposition specified in the File Plan for all the records types in use. File Plan instructions, in turn, stem from the applicable Records Disposition Authorities. The annual audits evaluate the staff's understanding of the agency Records Management Policies, procedures, and rules of behavior and of such key concepts as Essential Records and CUI.

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

☒ Yes
☐ No

*Please explain your response:*
EXIM success in transitioning the permanent records to fully electronic recordkeeping would greatly benefit from:
1) Availability of NARA Web service for accessioning transfer of electronic records,
2) The publication of a Document Type Definition (DTD) or XML schema in support of accessioning transfers of permanent electronic records from federal agencies to NARA, and

3)Availability  of a test site, where EXIM could verify interface and format compatibility with NARA's ingest systems and the readiness of EXIM's internal Electronic Records Archives implementing EXIM records lifecycle management for permanent electronic records.