



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: Walter Boswell

Position title: Associate Managing Director

Address: 445 12th Street SW, Washington, DC 20554

Office telephone number: (202) 418-2178

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

Please list them below:

Federal Communications Commission (FCC)

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

Yes No

2a) *Provide a list of actions your agency, components, or bureaus have taken to meet this goal. Include specific information on your progress 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 FCC has transitioned to a new email platform to provide users with improved filter and search capabilities to better manage temporary and transitory email records. The agency's Information Technology Center has also taken steps to improve user's ability to retrieve and access archived email.

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

- The FCC is finalizing an email retention directive outlining policies and responsibilities for the management of email messages and attachments. The directive will be implemented during FY 2016.
- We are taking steps to implement the Capstone approach developed by NARA for identifying and managing email records. We are currently developing an agency-wide list of Capstone officials in accordance with GRS 6.1, and will complete and submit NARA Form 1005 during FY 2016. Agency disposition of emails will follow GRS 6.1 for both Capstone and non-Capstone employees.
- The FCC's Information Technology Center is researching tools and developing procedures to capture email, make it available for e-discovery and FOIA research, retain it based on GRS 6.1, and transfer permanent records to the National Archives.
- We will develop employee training concerning the FCC's email retention policies as well as practices to cull transitory and non-record emails and maintain emails considered Federal records. We will also develop training for Capstone officials to ensure their understanding of permanent records and the critical need to preserve their emails.

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.

The FCC has included this requirement as part of its email retention policy directive and will include this in email records training for Capstone and non-Capstone employees.

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).

FCC's records management staff conducts briefings for the agency head (Chairman) and Commissioners as well as their legal advisors and staff concerning the management and retention of paper and electronic records. Retention schedules for electronic records from these offices have been developed by the FCC and approved by NARA. In advance of the announced departure of a Chairman or Commissioner, the records management staff coordinates with that office's staff and

with the Information Technology Center to ensure that all permanent records from the office are preserved and accessioned to the National Archives.

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.*

- The FCC has undertaken file reviews in several bureaus and offices, as well as in the Commission's Reference Information Center. These reviews revealed several groups of unscheduled records. These have been identified in previous years' RMSA Reports. We have developed or are in the process of developing retention schedules for these record groups.
- The FCC's records management staff also reviewed information collection requests submitted for OMB approval as required by the Paperwork Reduction Act (PRA). Approved information collections are an excellent source of new record groups being created.

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

- We will complete file reviews and identify and schedule remaining existing records.
- Going forward, the agency's PRA and records management staffs are working together to ensure that retention schedules are developed for new unscheduled information collections approved by OMB.

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

Yes No

6a) *Provide a list of the actions your agency, components, or bureaus have taken to meet this goal. Include specific information on your progress 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.*
- The FCC's records management staff is working with the Commission's Information Technology Center to identify document management and retrieval

systems that will facilitate the electronic retention and disposition of all agency records including permanent records. The FCC's Office of Inspector General has piloted one such tool for their records with successful results.

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

- We will amend our existing records management directive to include policies and procedures to manage permanent records electronically.
- We will select and implement a document management system to improve the capture, retention, retrieval, and disposition of Commission records and facilitate the transfer of permanent records to the National Archives.
- The FCC's records management staff will take steps to ensure that schedules for permanent records accurately reflect their existence in electronic format.

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.

The efforts expended at the FCC to implement the *Managing Government Records Directive* have made our records management operations more effective. The *Directive*, as well as the Capstone initiative, has raised the importance of records management to senior levels within the Commission. This has paved the way for file reviews and clean-up, greater attention to scheduling unscheduled records, and increased interest in identifying and implementing email and document management tools.

The major challenge in this effort is changing an agency employee culture of maintaining paper records even as we transition to digital government. Getting staff members to give up their paper, even when a digital version exists, has met with some resistance. Given time, as well as smaller work areas and greater use of telework, employees will hopefully adjust to the digital document environment.

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.*

- The FCC's records management staff works directly with the offices of departing senior officials to retrieve and capture records that must be retained at the conclusion of each official's tenure. We alert the official and their staff concerning their Federal records responsibilities, including prohibitions on the removal of records.

8b) *Provide a list of the actions your agency, components, or bureaus plan to take 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.*
- The FCC records management staff will reach out proactively to senior agency officials during 2016 to alert them of steps to be taken with their records before their departure from the FCC. We will also work closely with the Commission's Information Technology Center to begin the process of collecting electronic records of officials who have announced their departure.