



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: Darren Ash

Position title: Chief Information Officer (CIO)

Address: 11545 Rockville Pike, Rockville, MD 20852

Office telephone number: 301-415-7443

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

Please list them below:

- Nuclear Regulatory Commission (NRC)

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.*

NRC Response:

In order to manage all e-mail records in an accessible electronic format, the NRC is updating email policy and implementing a technical solution based on the National Archives and Records Administration (NARA) Capstone Guidance. A Capstone approach will allow for the retention of email to be based on the position of the email account owner.

The NRC's Records Team is finalizing a role-based email policy to supplement the agency's current business-based email policy and has been working with the technical
SAO for Records Management FY 2015 Annual Report

staff on a Chief Information Officer (CIO)-sponsored e-mail Capture and Management Working Group (ECWG). The ECWG has developed functional requirements for partially and fully automated IT solutions to capture e-mail, provide for access and retrieval, and streamline disposition actions. The ECWG is currently evaluating vendors' IT solutions that also support emerging needs and various agency initiatives such as moving information and services to private offsite servers (the "cloud"). The ECWG is expected to recommend an IT solution to the CIO by the end of January 2016.

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

NRC Response:

In 2016, the NRC will notify NARA that it will utilize a modified General Record Schedule (GRS) 6.1, E-mail Managed under a Capstone Approach, and submit a proposed disposition schedule for NARA's approval. The NRC will begin to procure an e-mail capture and management IT solution in late 2016 to early 2017 to help the agency manage all e-mail records in an accessible electronic format. The ECWG will continue to conduct outreach, communication, and training so that NRC employees understand their responsibilities under the Capstone approach.

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.

NRC Response:

On January 29, 2015, the NRC CIO issued an agency announcement instructing staff to conduct business via agency networks or, if using agency networks is not a viable option, to copy or forward messages to their agency accounts to capture agency information so they may be appropriately managed as records, if applicable.

Given the inability to monitor for compliance, periodic reminders will be provided in agency announcements, emails, training, and all staff meetings.

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).

NRC Response:

The NRC makes information and records management training mandatory for all employees (including executives). Training covers electronic messaging and teaches employees how to distinguish and manage records with various retention periods. Training also helps employees understand that if they create or receive information that would qualify as a record, and that record is more than transitory, employees are responsible for ensuring the record is placed into ADAMS.

The NRC manages texts, chats, and instant messaging as transitory records. These types of electronic messages are placed into ADAMS by employees upon determination that a longer-than-transitory retention period is appropriate.

The NRC provides special training and resources to help Commissioners (agency heads) manage the electronic messages they create or receive via e-mail message. These e-mail messages are reviewed, printed, and filed by the Commissioners and their selected staff members. In addition, when Commissioners are appointed to the NRC, they receive an information and records management briefing upon joining the agency. The records team is working with Commission staff to develop a desk reference guide to standardize recordkeeping practices across Commissioners' offices, set expectations regarding how information should be labeled and managed, and clarify what types of information Commissioners may and may not remove when they leave the agency. The NRC records staff is also working with the Commissioners' offices to maintain these records in electronic format.

For every other employee, including Office Directors, electronic messages created or received via e-mail form are currently managed by the e-mail account holder who determines whether an e-mail message is a record. If so, the account holder files the e-mail in the ADAMS recordkeeping system. The email is deleted 30 days after the email account holder deletes the email.

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.*

NRC Response:

Per Directive Goal 2.5, the NRC worked with NARA in 2013 to identify that no paper or non-electronic records were unscheduled.

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

NRC Response:

The NRC plans to enhance its already-submitted records schedules through its Records Retention Revisions Project, which builds upon industry and NARA best practices. These records retention strategies include the following planned activities:

- Developing bucketed (aggregate) retention timelines that provide for retentions in 5-year increments. The NRC will use the terms "life of republic" and "life of mission" to differentiate between permanent records that are accessioned to NARA and temporary records that the NRC will maintain for extended long-term periods; and
- Developing bucketed records series to align retention schedules with functional lines of business (LOB), consistent with the NRC's budget structure.

Successful execution of the Records Retention Revisions Project will result in the following improvements:

- Reduced number of records in ADAMS' records repository that are past their retentions;
- Reduced number of errors, duplications, and redundancies in agency repositories (ADAMS and SharePoint);
- Reduced number of document templates for entry into ADAMS being used by NRC staff;
- Updated NUREG-0910, NRC Comprehensive Records Retention Schedule, based on LOB;
- Updated office information inventories in validation of the updated NUREG-0910; and
- Standard business rules and instructions for adding documents to ADAMS and SharePoint.

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.*

NRC Response:

The NRC's policy is to maintain permanent records in ADAMS. Key projects and activities supporting automated capture, access, and disposition are:

- Standardized Processes – These have already been developed and implemented for receiving, preparing, scanning, and indexing records for capture.
- Digitization – A project has been initiated to reduce the amount of paper-based permanent records. The agency is on target to digitize all permanent records by the end of 2019.
- ADAMS Records Manager – The agency is currently developing records management controls in ADAMS to automatically capture records and apply records disposition rules. The target completion for disposition rules is the end of 2018, and automated capture and classification is targeted for 2020.
- Records Retention Updates – NRC is establishing updated record retentions that are understandable and can be implemented in an electronic environment based on agency lines of business. Target completion date is 2017.
- Records and Information Management Certification (RIM Cert) – NRC will implement a pilot in 2016 to embed record requirements (access and disposition) into the agency's IT/Information Management project management methodology and governance framework. This project will help ensure appropriate new software and systems do not receive authority to operate before complying with NRC records management requirements.

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

NRC Response:

The NRC will continue to implement the projects cited in question 6a above to meet target dates.

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.

NRC Response:

The implementation of the Managing Government Records Directive is one of the highest priorities within the Office of the Chief Information Officer, resulting in a positive impact on the NRC's records management program. The ability for staff and the public to access more of the agency's records because of digitization and the capture of email of high-level management supports the digital government (and the agency's) strategic objective for an increasingly mobile workforce.

The agency would benefit from additional guidance from NARA in implementing the Capstone approach to managing email records, including help in socializing it across the agency.

The agency also could benefit from including IM best practices and compliance at the start of development of new IT business solutions.

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.*

NRC Response:

The NRC is an independent regulatory body where the Commissioners (politically-appointed positions) serve term appointments and do not depart when there is a change in the Presidential administration. Therefore, records management is mostly impacted at the termination of Commissioners' terms. To mitigate records management risks resulting from a Commissioner's end-of-term, the agency's Records Team works closely with Commission staff on agreed-upon approaches to closing a Commission office to ensure permanent records are preserved.

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.*

NRC Response:

The NRC's Records Team, in collaboration with the Commissioners' offices and the Office of the General Counsel, is developing standardized desk procedures to provide instructions on how to set up files at the beginning of a term and how to close the files and transfer them at the end of a Commissioner's term.