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: Brodi Fontenot

Position title: Assistant Secretary for Management, Department of the Treasury

Address: 1500 Pennsylvania Ave., NW
                   Washington, DC 20220

Office telephone number: 202-622-0016

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

This report is being submitted by the Records Officer for the Office of the Comptroller of the Currency (OCC). The report covers the OCC only.

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)*

☐ Yes   ☒ No

    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.*

In 2014, the OCC's Information Technology Services Division (ITS) deployed e-mail journaling. Journaled e-mails of the Comptroller will be retained permanently and those of senior officials (Band VIIs or higher) will be retained for 10 years. Under the OCC's current e-mail policy, all OCC employees are still required to manage their e-mail records in a record-keeping system.

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

The OCC's Records Management Program is working to reestablish a cross-functional team (E-Mail Working Group) whose goal would be to comply with all aspects of the Directive regarding e-mail and instant messaging.

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.

If the OCC establishes a cross-functional team (as indicated under the answer to question 2(b)), the management of non-official accounts would be addressed as part of the project.

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).

In July 2014, the OCC began journaling all e-mails to and from the Comptroller. Journaling allows the agency to store, manage, and retrieve all incoming and outgoing e-mail messages in a centralized way that is convenient, secure, and auditable. E-mail to and from the Comptroller will be kept permanently. In late January 2014, the OCC began journaling e-mail sent to and from the agency's most senior employees. These e-mails will be archived and retained for 10 years.

All employees and contractors e-mails are currently backed up and retrievable for 30 days. E-mail older than 30 days can only be retrieved by searching individual mailboxes or Personal Storage Table (PST) files. The OCC currently is in the process of an e-mail services procurement and anticipates, in the first quarter of FY 2017, that the agency will begin journaling all employee and contractor e-mail. At that point, all e-mail to and from OCC accounts (occ.treas.gov) will be stored for 10 years and subject to disclosure. At that time, the agency will also begin archiving Instant Messages that are sent through Microsoft Skype for Business on OCC-provided computers for one year. In addition, all federal records can be stored in the OCC documents management/records management system (eDocs). Currently, text messages and Chat sessions are not archived.

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.*

All of the OCC's paper and non-electronic records are scheduled. The Records Management Program does not anticipate submitting any records retention schedules in 2016.

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

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)*

☒ 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.*

In 2007, the OCC deployed a DOD-5015-certified records management application (RMA), now called eDocs. The initial user of the system was the OCC's Large Bank Supervision (a business unit that creates many permanent records). Moreover, the OCC designed the system to be enterprise-wide ready. Since the initial release of eDocs, the OCC has captured several additional categories of permanent records in eDocs. For example, OCC Web content "publications;" former Comptroller's e-mails and calendars, and e-mails of departing high-level officials.

In 2013, the OCC issued a policy entitled, "Certifying Electronic Record-Keeping Functionality in OCC Systems," establishing an internal certification process in order for the OCC to incorporate electronic record-keeping functionality (or integrate to a system having that functionality) into new and existing electronic information systems. Each year, the Records Management Program works with two or three business units in order for their systems to be certified as meeting federal electronic record-keeping requirements. Some of these systems contain permanent records.

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

In 2016, the Records Management Program continues to work with the OCC's Licensing Division to capture Licensing applications by integrating Licensing's system with eDocs.

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.*

In 2015, the OCC updated its electronic signature policy to make it easier for employees and contractors to digitally sign records using a personal identification verification (PIV) card. This, in turn makes it easier to convert paper-based processes to automated, digital processes. The OCC continues to expand the use of its core electronic document management/records management system, eDocs. In 2015, the OCC issued <u>Supervisory Memo 2015-4 "Handling of Sensitive Bank Information-Revised"</u> that emphasizes the use of electronic means to provide information to the OCC and states that paper documents should only be used when no other means are available. When developing internal systems, the OCC continues to look for opportunities to eliminate paper. The OCC's Personnel Management and Compensation System (PMCS) deployed in September 2014 eliminated annual paper performance evaluations for 4,000 employees. In addition, the OCC's ethics program and financial disclosure processes are now conducted electronically.

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

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

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

The Comptroller was appointed for a five-year term ending in spring 2017. As a standard practice, two months before his departure, the Records Management Program will work with the Comptroller's Office and the Information Technology Services Division to ensure his records are captured and managed eDocs.

> 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.*

The OCC's Disclosure Services Division, as a standard practice, reviews requests of all departing officials at all levels, including contractors, who wish to remove copies of official records of the agency, consistent with the Freedom of Information Act.