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2015 Senior Agency Official for Records Management Annual Reports Analysis

National Archives and Records Administration
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FOREWORD

The *Managing Government Records Directive* (M-12-18), jointly issued by the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA) on August 24, 2012, requires federal agencies to appoint a Senior Agency Official for Records Management (SAORM). As part of their responsibilities, these officials provide strategic direction and resources to ensure the success of all aspects of their agency's records management program. In addition to ensuring compliance with NARA's records management statutes and regulations, the agency SAORMs must lead the implementation of the *Directive's* requirements and the preparation for the upcoming change in Presidential administration. The SAORMs must ensure that departing and incoming political appointees and senior officials are briefed on their recordkeeping responsibilities. In these and other areas, the leadership of the agency SAORMs is critical to the successful transition to a digital Government.

One of their most visible responsibilities is to report annually on progress in meeting the *Directive's* goals and actions to the Chief Records Officer for the U.S. Government. This year, we demonstrated our ongoing commitment to open government by posting the SAORM reports on our website at http://www.archives.gov/records-mgmt/agency/sao-reporting.html for all to view. In addition to making the reports available online, we reviewed the individual reports looking for trends and progress. The results of our review are contained in this report, the *2015 Senior Agency Official for Records Management Annual Reports Analysis*. Overall, the great majority of Federal agencies reported that they have met, or will meet, the major goals and actions outlined in the Directive.

Working together, NARA and all agencies continue to make progress on the key goals and requirements in the *Directive*. For us to succeed as a records management community, the SAORMs in each agency must drive the change that needs to happen if we are to realize the vision of a digital Government. Based on the data summarized in this report, we are making progress, but there is still much work to do.

DAVID S. FERRIERO
Archivist of the United States

Introduction

The *Managing Government Records Directive (M-12-18)* requires Senior Agency Officials for Records Management (SAORMs) to provide an annual report to NARA. In 2015, NARA received reports from 92 department and agency SAORMs. This document provides a summary and analysis of information received from the SAORM reports. This document also includes a description of the challenges and positive observations reported by SAORMs as they work to implement the provisions of the *Directive*. The individual agency reports are available on NARA's website at http://www.archives.gov/records-mgmt/agency/sao-reporting-2015.html.

Methodology

For consistency in reporting, NARA sent SAORMs a reporting template in the fall of 2015. The template contained eight questions (see Appendix for a copy of the template). NARA emailed the template to 103 designated SAORMs. For a list of designated SAORMs, see NARA's website at: http://www.archives.gov/records-mgmt/agency/sao-list.html. NARA received 92 individual responses plus three (3) components of Departments whose reports were combined into the overall Departmental report. There were eight (8) reports not received. This represents a 92% response rate.

Data Analysis

The information in Figure 1 (below) summarizes the responses from agencies to the core template questions.

2015 SAORM Annual Report Results (Core Questions)

- Question 2 - Will meet the target of managing emails electronically by Dec. 31, 2016
- Question 3 - Are taking actions to ensure records in non-official messaging accounts are captured in an official account within 20 days
- Question 5 - Will Submit Records Schedules for all existing paper and other non-electronic records by Dec. 31, 2016
- Question 6 - Will meet the target of managing electronic permanent records in an electronic format by Dec. 31, 2019
- Question 8 - Are preparing for the upcoming change in Presidential administration
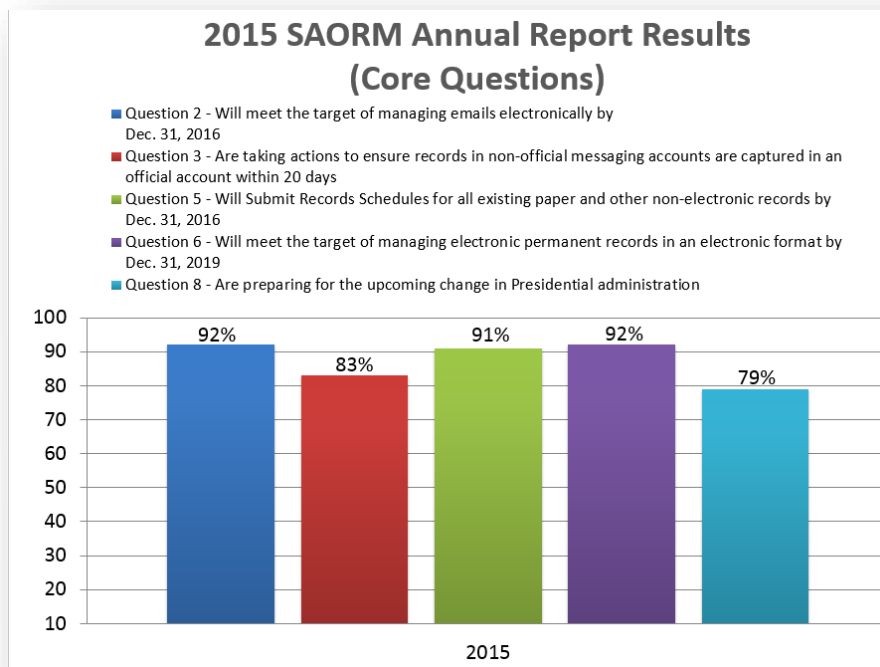
Figure 1 - Percentage of positive ("yes") responses to template questions

Sixty-one percent (61%) of the SAORMs recorded all "yes" responses to the five questions listed in Figure 1. No SAORMs reported all "no" responses to these questions. Multiple "no" responses by a SAORM for these questions were unusual.

NARA analyzed the reports for each question and identified a number of trends, themes and observations.

Email Management

Question 2 of the template asked "*Is your agency going to meet the Directive goal to manage all email records in an accessible electronic format by December 31, 2016?"*

Ninety-two percent (92%) of the SAORMs responded that their agencies would meet this goal.

Trends, Themes, Observations:

The SAORM reports discussed email management activities in Federal agencies. Some of the trends and activities reported were:

- The majority of SAORMs said their agencies either will use or are considering using the Capstone Approach[1] for managing email records.
- Many of the reports described the formation of working groups or partnerships (usually with general counsel, IT, and stakeholder units) related to email management.
- The reports frequently mentioned revisions or updates to records retention schedules and policies to address email management.
- A few responses mentioned automated email capture. Of these few, journaling was the concept most often described.
- The reports listed training and briefings as actions agencies have taken and will continue to take.
- The approaches and software products or tools[2] listed most often in the reports were:

    - Alfresco
    - Archive Manager for Windows
    - Autocategorization
    - BridgeLogiQSuite
    - Cloud solution
    - Documentum
    - Enterprise-wide email management
    - Google Vault
    - ID Solutions
    - MS Exchange
    - MS Office 365
    - Outlook

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[1] Capstone Approach is outlined in the NARA Bulletin 2013-02 "Guidance on a New Approach to Managing Email Records" issued August 29, 2013.

[2] No endorsement is made or implied by NARA. Information is merely noting that specific products were mentioned in the reports.

- Symantec E-Vault

Over the past few years, SAORM reports indicated agencies held different viewpoints on the definition of successful email management. NARA provided some clarification in the 2015 template by asking for specific information about email management. SAORMs reported on these specifics when describing activities or strategies for email management in their agencies.

In April 2016, NARA issued a new guidance product, *Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18).* This guidance was sent to SAORMs to provide clarification of the existing requirements that directly relate to email management. NARA has defined successful email management as having the policies and systems in place to ensure that email records can be accessed and used for as long as needed, until the appropriate disposition is applied. This guidance may impact the 2016 SAORM reporting as NARA and agencies develop a shared understanding of successful email management.

Federal Records Act Amendments[3] and Non-Official Accounts

Question 3 of the template asked, "*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?*"

Eighty-three percent (83%) of the SAORMs responded that their agencies have taken action to implement the amendments.

Most agencies reported they have implemented this change by updating policies, guidance, memoranda, briefings, and training. A number of agencies indicated they prohibited the use of non-official accounts for agency business.

Internal Controls

Question 4 of the template asked SAORMs, "*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).*"

Internal controls are a series of actions and activities designed to provide reasonable assurances for effectiveness, reliability and compliance with laws and regulations. Relatively few agencies provided sufficient details regarding their internal controls for managing electronic messages. From the responses NARA received, there appears to be uncertainty as to what internal controls are and how to establish them.

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[3] Public Law 113-187, http://www.gpo.gov/fdsys/pkg/PLAW-113publ187/pdf/PLAW-113publ187.pdf.

The Office of Management and Budget establishes a framework and guidelines for internal controls in Executive Branch agencies in OMB Circular A-123 *Management's Responsibility for Internal Control*. NARA requires internal controls over agency electronic records management programs and activities in 36 CFR 1236.10. Resources available for further information about internal controls include the *Generally Accepted Auditing Standards (GAGAS)* (published by GAO) and *2013 Internal Control - Integrated Framework* (published by the Committee of Sponsoring Organizations (COSO)). If this question is used again in future reports, NARA will include more explanation regarding establishing internal controls for managing electronic records.

Records Schedules

Question 5 of the template asked, "*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?*"

Ninety-one percent (91%) of the SAORMs responded that their agencies will meet this goal.

Trends, Themes, Observations:

The SAORM reports discussed records scheduling activities in Federal agencies. The trends and activities were:

- Most SAORMs reported that their agencies have already completed records schedules or are updating them.
- Some SAORMs reported that their agencies are conducting inventories of their records to determine if they have any unscheduled records.
- Some reports indicated agencies are covering scheduling in their staff records management training.
- A couple of reports indicated that agencies are hiring contractors or additional staff to address the scheduling activity.

Permanent Electronic Records

Question 6 of the template asked SAORMs, "*Is your agency going to meet the Directive goal to manage all permanent electronic records in an electronic format by December 31, 2019?*"

Ninety-two percent (92%) of the SAORMs responded that their agencies will meet this goal.

Trends, Themes, Observations:

This question on permanent electronic records management received the same statistical response as email management: 92%. However, the narrative explanations for the two questions varied widely. Whereas the reports described specific activities for email management, the reports discussed much more general activities for managing permanent electronic records.

The trends and activities for managing all permanent electronic records were:

- Inventorying unscheduled and permanent records
- Scheduling unscheduled records and identifying permanent records
- Developing strategic plans to transition to digital environment
- Developing recordkeeping requirements
- Updating guidance
- Mandating use of electronic records
- Training staff
- Using contractors and hiring some staff and implementing EDMS/ERMS (Electronic Document Management Systems / Electronic Records Management Systems)

From the responses NARA received, there seems to be some confusion about this question and the goal of the *Directive*. Some reports indicated that the agencies are focusing only on the management of permanent electronic records currently being created. But other agencies are undertaking broader activities to improve the management of both temporary and permanent electronic records. Some reports described digitization efforts to scan permanent paper records and manage them electronically. In future reporting for the Records Management Self-Assessment (RMSA) and SAORM Reports, NARA intends to ask more specific questions on this requirement to determine more precisely where agencies are in meeting this goal.

Insights and Challenges

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

This open-ended question provided SAORMs an opportunity to provide NARA information relating to the challenges and successes they face with implementing electronic records management and transitioning to digital government.

In general, the positive insights reported were:

- Overall increased awareness for records management in agencies
- Information technology staff and records management staff are talking together more about projects, issues, roles, etc.
- Agencies are forming internal working groups to address electronic recordkeeping
- Agencies are allocating more resources for records management
- Senior officials are providing more visible support for records management
- New agency Records Officers continue to work towards obtaining NARA's Certificate of Federal Records Management Training
- Agencies are prioritizing records management for all staff
- Making progress in reformatting (digitizing) records
- More strategic planning since the *Directive* was issued in 2012
- More records are being scheduled to meet the 2016 *Directive* goal
- Agency directives and policies are being reviewed and updated for electronic records

Some of the challenges reported were:

- Sheer volume of electronic records
- Electronic records in multiple formats
- Metadata and tagging issues
- Changing technology
- Lack of additional resources (budget, staffing, skilled staff)
- Other duties outside records management and conflicting priorities
- NARA needs to provide help – especially with smaller agencies
- Lack of direction on how to implement electronic recordkeeping

Changes in Presidential Administration

Question 8 of the template asked SAORMs, *"With regard to records management, is your agency preparing for the upcoming change in Presidential administration."*

Seventy-nine percent (79%) of agencies indicated that they are preparing for the upcoming change.

Trends, Themes, Observations:

The 2016 election will result in a change of Presidential administration; therefore, NARA asked what agencies are doing to prepare and to ensure that the records of Presidential appointees and other senior officials are properly accounted for and preserved. The trends and activities reported were:

- Most SAORMs reported that their agencies have a process in place to inform senior officials about records management obligations.
- Briefings, training sessions, and written instructions are used to remind agency staff about records management issues.
- Exit interview process appears to be common in many agencies. Sometimes this is conducted by the General Counsel's office or the SAORM. Often the Records Management staff is directly involved with the interview.
- Some agencies not only address departing officials, but also brief incoming officials about their records management responsibilities.
- Some agencies report being very proactive in capturing senior officials' records upon their departure.
- A large number of agencies reported that the change in the Presidential administration would have minimal impact on their senior officials due to the organizational structure of their executive positions.

Conclusion

The great majority of departments and agencies indicate they are going to meet all of the goals and activities of the *Managing Government Records Directive*. The *Directive* was created in

2012 with full implementation expected by the end of 2019. Certainly, there remain challenges as the *Directive* reaches the mid-point of its full implementation. It is also important to note that the *Directive* objective of modernizing records management across the Government does not end in 2019. Rather, continuing into the next decade, NARA expects to work with all Federal agencies to identify risks, opportunities, and actions needed to realize the vision of a digital Government. At this point in time, however, progress has been made, challenges recognized, and solutions are being investigated.

If you have any questions about this analysis, or the annual SAORM reporting process, please contact **prmd@nara.gov.**

Appendix
2015 SAORM Annual Report Template

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:

Position title:

Address:

Office telephone number:

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

   Please list them below:

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.*

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

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.

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).

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.*

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 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.*

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

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.

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 <u>have taken</u> to ensure records of departing senior officials will be appropriately managed during the upcoming change in Presidential administration.*

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.*