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 and Senior Agency Official for Records Management

Address: 1500 Pennsylvania Avenue, 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?

> *Please list them below:*
>
> Department of the Treasury, consisting of the Departmental Offices (Headquarters) and the following Treasury Bureaus:
>
> - Financial Crimes Enforcement Network
> - Office of the Inspector General
> - Internal Revenue Service
> - Office of the Special Inspector General for Troubled Asset Relief Program
> - Treasury Inspector General for Tax Administration
>
> Please note that the following Treasury Bureaus will report separately for this year:
>
> - Alcohol Tobacco Tax and Trade Bureau
> - Office of the Comptroller of the Currency
> - U.S. Mint
> - Bureau of Engraving & Printing
> - Bureau of the Fiscal Service

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.*

The Department is in the process of obtaining NARA approval to adopt the General Records Schedule for Capstone. The Department is also developing guidance (including a new Treasury Directive) specific to email management under the Capstone approach. Implementation efforts to date include drafting IT policies that will govern Capstone and non-Capstone accounts, developing rules on applying litigation and other administrative "holds" to email records, and establishing HR processes to identify new and legacy Capstone employees. The Department is also developing Capstone training and awareness to educate senior leadership and employees in Departmental Offices and serve as a model for Treasury Bureau training.

Please note that the following Bureaus have taken the following additional actions:

Internal Revenue Service: NARA approved an IRS-specific email management retention schedule. IRS has established disposition rules for agency email which identify either 7 or 15-year retentions for non-Capstone employees and transfer of permanent emails for Capstone officials.

Office of the Inspector General: OIG currently has Barracuda (an archiving system) in place and is evaluating Microsoft Exchange 2013. Barracuda is fully searchable and has retrieval functionality.

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

- Finalize Department-wide guidance, in particular Treasury Directive 80-07 (email management policy) and related Treasury Directive Publication 80-07 (email management manual)

- Finalize the Capstone implementation plan at Departmental Offices and support Treasury Bureau efforts to adopt or develop a similar implementation framework
- Complete the integration of Capstone email management rules into IT systems within Departmental Offices, and support Treasury Bureau efforts to adopt or develop similar IT rules
- Finalize the strategic Capstone communication plan, key educational messages, and training products at Departmental Offices and support Treasury Bureau efforts to adopt or develop similar communication and training materials

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 Department revised its policy on IT Security (Treasury Directive Publication 85-01) to require Departmental personnel to use Treasury email accounts for the performance of official duties. The policy allows the use of a personal email account to send and receive email messages related to official duties in very rare circumstances (e.g., when remote access to the Treasury network is unavailable), but requires personnel to copy their Treasury email account on any such messages.

Please note the following additional Bureau actions:

Internal Revenue Service: Employees participating in the "Bring Your Own Device" (BYOD) program are allowed to use the IT-approved BYOD application on their approved personal devices. The BYOD User Agreement includes employee understanding that any Federal records created outside the IRS approved mobile device business software must be forwarded to an official system with 20 days.

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).

Under the Capstone approach, the Department is developing the following internal controls within Departmental Offices, and is supporting Treasury Bureaus in adopting or developing similar controls.

Departmental Offices are implementing a uniform three-folder Inbox structure to manage email messages and instant messaging (which is based on the existing Departmental Offices email system). This structure will allow users to separate their email messages into a "Working" folder (which will retain emails permanently in the case of Capstone account holders or seven years for non-Capstone account holders), a "Personal" folder (which will retain emails for 90 days), and a "Provisional" folder. The Provisional folder is designed for emails that are subject to special circumstances (e.g., an administrative or litigation hold) that require retention beyond the standard retention period (e.g., more than seven years for a non-Capstone account holder). In addition, the default email management rules will treat all other email content (including Sent Messages and Calendar Items) as Working emails, to be retained in accordance with the account holder's Capstone status.

Please note the following additional Bureau actions:

Internal Revenue Service: Senior Agency Official (Capstone) emails are permanent and other Executive (non-Capstone) emails are scheduled as a 15-year record. IRS is drafting new Instant messaging policy and procedures in accordance with NARA guidance and other IRS recordkeeping requirements.

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.*

- Conducting routine records inventory and retention schedule reviews to ensure that all records are scheduled and aligned with current business processes
- Performing records management review as part of the Privacy & Civil Liberties Impact Assessment process, to ensure that systems establish records schedules for any new records types

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

- Continue the above-identified actions
- Ensure that records management requirements are incorporated in the development of new IT systems

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 Department has taken the following actions within Departmental Offices and supported the Treasury Bureaus in adopting these or taking similar actions:

The Department championed the adoption of electronic content management platforms – such as SharePoint in the case of Departmental Offices – that enable records management functionality. The Department provided (and continues to provide) training to Departmental Offices employees on SharePoint's records management capabilities and making the transition to an all-electronic records management system. The Department also introduced digitization initiatives focused on migrating paper-based records to SharePoint records centers.

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

- Finalize the implementation path toward fully electronic management of permanent Departmental records
- Update existing guidance, including Treasury Directive 80-05 (records management policy) and Treasury Directive Publication 80-05 (records management manual), to codify the goals of the Managing Government Records Directive
- Provide enhanced training on core records management concepts and responsibilities in an electronic environment
- Establish internal compliance and reporting mechanisms to assess compliance with the Managing Government Records Directive and identify records management improvement opportunities

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.

From an educational standpoint, the topic of electronic records management poses unique challenges. For example:

- Because electronic documents lack a physical presence, the drawbacks of poor electronic records management are often less visible or obvious to users.
- Individual users vary in their comfort level with technology. As a result, promoting electronic records management sometimes first requires getting users comfortable with the underlying technology (e.g., SharePoint).

That said, effective education on electronic records management must also incorporate core records management principles. For example, users can often reduce significant quantities of their data through a better understanding of the difference between electronic records and non-records.

Please note the following additional Bureau insights:

Internal Revenue Service: The IRS has established an Enterprise Electronic Records Management Solution (EeRMS) Program Management Office (PMO) within the Records and Information Management (RIM) Program Office. The EeRMS PMO supports the IRS in the socialization and implementation of best practices in managing electronic records including implementation of records and information management capabilities for eRecords, eMail, and eMessages. The EeRMS PMO will develop and provide training in various formats to enable program offices to effectively manage eRecords in their current environments.

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.*

The Department has taken the following actions within Departmental Offices and supported the Treasury Bureaus in adopting or taking similar actions:

- Improved the personnel off-boarding process to: automatically notify departing personnel of their records responsibilities; provide access to records-related exit forms; and put them in contact with the Departmental Records staff for any questions
- Conducted in-person exit interviews with senior officials to ensure that Department records are preserved appropriately

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.

- Further enhance records-related exit forms to require personnel and their management to specifically certify they have taken steps to appropriately manage records and avoid the improper removal of the same
- Expand Departmental staff assigned to monitor personnel departures and conduct exit interviews
- Continue the off-boarding and exit interview measures discussed above to ensure appropriate preservation of agency records