



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: Dr. Gregory Parham

Position title: Assistant Secretary for Administration

Address: 1400 Independence Avenue, SW, Washington, DC 20250

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

Please list them below:

- Agricultural Marketing Service (AMS)
- Agricultural Research Service (ARS)
- Animal and Plant Health Inspection Service (APHIS)
- Economic Research Service (ERS)
- Farm Service Agency (FSA)
- Food and Nutrition Service (FNS)
- Food Safety and Inspection Service (FSIS)
- Foreign Agricultural Service (FAS)
- Forest Service (FS)
- Grain Inspection, Packers and Stockyards Administration (GIPSA)
- National Agricultural Statistics Service (NASS)
- National Institute of Food and Agriculture (NIFA)
- Natural Resources Conservation Service (NRCS)
- Risk Management Agency (RMA)
- Rural Development (RD)
- Departmental Program and Staff Offices

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.

- United States Department of Agriculture (USDA) email is archived using ProofPoint, which is part of the Office 365 Exchange on-line service. All incoming and outgoing messages are captured automatically and stored in an email archive. Messages are fully searchable and retrievable in real-time, or with a batch process. At any time, archived messages can be viewed, retrieved to a user's email inbox, or exported to an Outlook data file. USDA will be switching from ProofPoint to Microsoft Exchange on-line archiving during 2016, which provides equivalent functionality at a lower life-cycle cost.
- USDA formalized a Chartered Strategy for Digital Information Management Working Group to define near-term and long-term strategies, requirements and agency needs to manage permanent and temporary email records by December 31, 2016. This working group consisted of subject matter experts from stakeholders units, records officers, legal counsel, information technology, litigation support, civil rights, enterprise architecture, privacy officers and freedom of information officers, all of which documented the requirements of each functional area. The Working Group provided a recommendation to the USDA Chief Information Officer (CIO) to implement the Capstone approach within USDA.
- USDA revised the current Departmental Records Management Directive/Policy to incorporate managing email via the Capstone approach. This policy implements the Office of Management and Budget (OMB) M-12-18, Part I, Goal 1.2, and NARA Bulletin 2013-02, *Guidance on a New Approach to Managing Email Records*. Under the Capstone approach, USDA will manage all email records based on the role of the email account user and/or office, rather than on the content of each email. USDA will manage all email records in an appropriate electronic system that supports records management and litigation hold requirements, including the capability to identify, retrieve, and retain the records for as long as they are needed.

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

- Draft a decision memorandum to the Assistant Secretary for Administration and Agency Administrators for controlling USDA e-mail archives costs and managing e-mail records electronically. The memorandum will also provide information on meeting Goal 1.2 of OMB M-12-18, *Managing Government Records Directive* and NARA's Bulletin 2013-02, *Guidance on a New Approach to Managing Email Records*.

- Develop procedures for identifying and managing role-based email accounts.
- Finalize the process of identifying Capstone Officials. Once the identification process is completed, USDA Agency Records Officers will complete the *NA-1005, Verification for Implementing General Records Schedule (GRS) 6.1 Form* to be submitted to NARA for approval.
- Develop a strategy to maintain an on-going updated list of Capstone Officials.
- Manage USDA email via Microsoft Exchange On-Line Archiving in calendar year 2016.
- FNS will be conducting a records management application pilot to test the capability to capture, retrieve, access and dispose of electronic records. This pilot will include both temporary and permanent records, as well as email records.

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.

- A memorandum was sent to all USDA employees from the Office of the General Counsel (OGC) pertaining to the 2014 amendments to the Federal Records Act (FRA) regarding the use of personal or non-official electronic messaging accounts for official business. In accordance with existing Departmental policies, USDA employees are instructed not to conduct official business using non-official or private electronic messaging accounts. Under unusual circumstances (such as in an emergency) where a USDA employee does use a non-official account to conduct official business, employees have been instructed to comply with the requirements specified in 44 U.S.C. § 2911 by copying or forwarding electronic messages (including email, texts, chats, and instant messaging) that are Federal records from their non-official accounts to official accounts within twenty (20) days.
- USDA revised the current Departmental Records Management Directive/Policy to incorporate the new requirements from the FRA Amendments of 2014. The Directive addresses the use of personal or non-official electronic messaging accounts for official USDA business. The Directive further outlines that all electronic messages in this context include both email and other electronic messaging systems used for

communicating between individuals, such as voice mail messages, text messaging, social media, and instant message (IM) programs.

- The FS Agency Fire Incident program staff partnered with other Federal natural resource agencies to create and implement protocols for capturing all fire-related email traffic created on non-Federal accounts. FS and other Federal natural resource agencies are partnering on the development of an internal fire incident communication system which, once in place, will ensure that all fire incident communication traffic is initiated and retained within a Federal communication system.
 - USDA's internal Records Management Training 101 and Refresher Course has been revised to include the requirements of the FRA Amendments of 2014.
 - The APHIS CIO sent an official email to all APHIS employees providing additional information on the new law, and what it means for all APHIS 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).
- Email and other electronic messaging services are provided by USDA. There is an electronic archival-based email retention system in place within USDA (i.e., backup tapes, an archival system, and the cloud email solution). All emails are retained on a USDA-wide electronic archival-based e-data retention system. The official record emails (including all applicable metadata and attachments) are being electronically retained in their original native format on the USDA-wide electronic archival-based email retention system. The email archive is currently captured in ProofPoint, and in the future will be captured in the Microsoft Exchange On-Line Archiving system and will be managed using the Capstone Approach.
 - USDA Agency Records Officers conduct records management briefings for Senior Officials on the appropriate disposition of records, including email, text messages, chat/instant messages, voice messages, and messages created using social media tools.
 - The Departmental Records Management Directive was revised to include guidance that any texts, chats, or other instant messages that are deemed to be of significant value should be forwarded to a USDA email account.
 - USDA Agency Records Officers ensure employees are notified through various forms of communications channels related to policy, emails, electronic bulletin boards, and agency newsletters.

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.*

- Agency Records Officers have worked closely with NARA to identify all unscheduled records, both paper and non-electronic records.
- Records Officers reviewed the records holding report at the Federal Records Center (FRC) to identify all unscheduled records that are currently located at the FRC, and submitted schedules to NARA.
- Records Officers analyzed the unscheduled records at the FRC against their record retention schedules to determine if any schedules could be applied. After the review, it was determined that three (3) USDA agencies had identified unscheduled records (including AMS, FNS, and FS):
 - In FY 2015, AMS submitted new and revised records schedules into NARA's Electronic Records Archives (ERA) for their approval.
 - FNS identified one (1) unscheduled record that will be submitted to NARA in FY 2016.
 - In FY 2015, FS analyzed all agency records stored at FRC, and assigned records retention schedules to all but 200+ transfers that were identified as pending agency determination'. These transfers are covered by approved records schedules, but contain 'mixed series' records and require further analysis. Prior to FY 2015, the Agency created records retention schedules for all agency records. Additionally, FS introduced the use of subject specific 'general' agency record categories for each primary subject area. The general categories are used to retain records not covered by other records schedules. The FS Records Officer signs-off on agency directives to ensure that new subject areas are assigned existing records retention schedules, or new records retention schedules are created when necessary. FS was recognized by NARA as an agency that had successfully dealt with unscheduled records.

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

- Records Officers will continue to educate and work with program offices in identifying all newly discovered unscheduled records/items.

- Agency Records Officers will continue to work with NARA in FY 2016 to identify any or all unscheduled records to ensure that the proper records schedules are applied.
- Records Management Liaisons will be assigned to each program area, to assist in identifying new program area records. These Liaisons will work within the program/staff offices to review the current records holdings in order to update the current records schedules
- In FY 2016, FS will work to resolve all FRC holdings as ‘Pending Agency Determination’. These holdings are ‘mixed series’ and require further analysis to determine applicable records retention schedules. FS will investigate combining current records retention schedules. The Agency Records Officer will continue to monitor the proposed agency direction to ensure that records retention schedules are in place and updated as needed.
- RD is in the process of creating a task force comprised of subject matter experts to revise and/or create Records Retention Schedules. Upon approval of the revised Records Retention Schedules from NARA, RD will re-visit each Records Retention Schedule every two (2) years to re-evaluate. Additionally, for any new programs created, the RD Records Officer will be notified in order to expeditiously create the Records Retention Schedule for the new program.
- Through APHIS’ Records Management Work Group, which was developed in 2013, APHIS is working to update the entire APHIS Records Management Handbook to be media-neutral, and to schedule any known unscheduled records. In addition, as mentioned above in Section 5a, APHIS plans to submit the remaining Records Schedules for IT system in the next year.

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.*

- Currently, USDA permanent records are captured and retained in agency shared drives; other permanent records born in electronic information systems remain within that system. These records are retained, searched, and retrieved and then transferred to NARA as required in the approved Disposition Schedule. Electronic records are also backed up to servers daily, providing agencies with an additional option for searching and retrieving files. The technologies used to manage these records electronically are decentralized across USDA. AMS, NASS and RMA are in various stages of managing their permanent electronic records within the SharePoint Records Center electronic records management application. The SharePoint Records Center allows employees to submit permanent electronic records directly into SharePoint, at which point, the record is preserved until the end of the retention period.
- NASS has been transferring permanent records to NARA in electronic format since 2007, and has met Goal 1.1 of the Directive. NASS is using SharePoint as their electronic record keeping system.
- RMA's Electronic Records Systems already supports managing all records electronically. The remaining steps to meet Goal 1.1 will focus on migrating any remaining hard-copy records to the system. The system uses native file formats for RMA's Microsoft Office documents, and .pdf with optical character recognition (OCR) for scanned documents.
- FS has been actively working to implement an electronic records management system since 2009. In FY 2013, FS piloted a manual process to electronically manage unstructured electronic official records, though it has been determined that this solution is not sustainable across the entire Agency and an electronic record keeping system is necessary. Currently, a team is in the procurement phase of the project. Project requirements and deliverables have been identified. A contractor is currently assisting the Agency in developing a strategy for implementing the electronic records management system once the software is procured.
- USDA has identified requirements, met with USDA stakeholders, and conducted a market analysis to identify an end-to-end records management suite (Records, E-mail Archiving, and eDiscovery) that will assist in automating the management of electronic records for improving compliance and consistency, and to reduce the record keeping burden on individual agency staff. The vendors USDA met with have DoD 5015.2 STD certified records management applications compliant with the FRA, OMB Circular A-130, as well as NARA requirements. USDA developed and conducted past performance questionnaires and past performance reviews; the past performance analyses for these vendors will assist USDA in determining

which vendor will be chosen to pilot an electronic records management application.

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

- USDA is in the process of identifying a possible enterprise-wide solution to manage permanent electronic records by December 31, 2019. USDA will continue working with stakeholders to develop functional requirements for a cost-effective enterprise solution and provide recommendations on associated pilot programs.
- USDA Agency Record Officers will work with program/staff offices to ensure records management functionality, and to ensure that the capture, retrieval, and retention of permanent records are incorporated into the design and development of electronic information systems.
- FNS plans to continue looking into and piloting electronic document management and electronic records management application systems until a working system is fully implemented agency-wide.
- In FY 2016, FS plans to:
 - Finalize Implementation Strategy
 - Procure an electronic records management system
 - Create and conduct training on the system
 - Develop agency policies and procedures on use of the system
 - Train system managers
 - Develop a strategy for identifying and moving legacy electronic unstructured records to the new system.
- In FY 2016-17, FS will:
 - Implement the new system Agency-wide
 - Move legacy electronic unstructured records to the new system
 - Develop a plan of action to electronically manage structured electronic records
 - Re-start their effort to schedule all structured electronic databases and applications.

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.

- Coordination within Departmental and Agency regulatory and technical staffs is essential to meeting the requirements of the *Managing Government Records Directive* and transitioning to digital government. USDA Records Officers are working together as part of a coordinated effort to share like experiences and possible streamlining in incorporating the move to digital government. The challenges are: 1) management/program support; 2) limited staffs; 3) implementation timing; 4) budget; and 5) changing technology.
- Agencies are working to establish and implement more stringent records and information governance requirements for many areas such as social media, instant messaging, electronic mail, and legacy and newly developed electronic information systems. Despite numerous challenges (mainly being short-staffed), the Agencies are making headway. Efforts are hampered by divergent goals between programs (at both USDA program/staff offices and USDA Agencies), multiple demands on limited funding, multiple demands on personnel, cultural resistance from employees, and lack of technical resources.
- Most electronic records management systems require an enormous amount of training with employees who deal with permanent records, as they are the ones who upload documents into this system (including training on how to use the system itself and making sure they understand which records are permanent). Many customized instructional guides must be made for reference. The Records Officer then must review the upload documents for correct metadata, which is an extremely time consuming process. This effort added a tremendous amount to the workload on staff.

Ways in which NARA could help:

- Coordinate GRS updates: issue consolidated updates twice a year instead of every few months.
- Become more aware of the impact of data calls on Agency records personnel. Agency personnel are getting squeezed between NARA data calls and lack of Agency resources that are available to respond in a timely manner.
- Create incentives to ensure accountability for Agency compliance.
- Create training and guidance for conducting on-site audits and reviews.
- Re-establish references services at Archives facilities for a fee. Agencies do not have the resources to send employees to NARA facilities to research and copy records needed for on-going Agency business.

- Provide free webinar training on scheduling electronic structured records, and on best practices for preparation of structured data for transfer to the National Archives.
- Provide year-to-year consistency in SAO and Records Management Self-Assessment (RMSA) criteria and questions to allow for comparison and tracking improvements over time.
- Create incentives to ensure accountability for Agency compliance.
- Make a basic overview course mandatory for all Federal employees.

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.*

- USDA held a Departmental Management Leadership Retreat to discuss and develop a successful succession plan for transition. Topics of discussion consisted of understanding what the Department needs to prepare for, identifying pre- and post-administration deliverables/actions, creating milestone for deliverables/actions, and identifying key cross-unit processes.
- USDA issued a Departmental Directive, *Records Management Policy for Departing Employees, Contractors, Volunteers and Political Appointees*. This Directive provides guidance and requires all employees to participate in a records exit interview, as well as sign Form AD-3001, *Documentary Materials Removal/Non-Removal Certification and Non-Disclosure Agreement*. The Directive also requires that records of departing personnel be inventoried to ensure Agency records, including social media and records maintained in a home office or on employees personal computing devices, are turned over prior to departure.

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.*

- Records management staff will update the senior official transition package to include new NARA requirements and the 2014 amendments to the FRA. The package will include documentation on creating, identifying, managing, and preserving Federal records that an official will create during their tenure at USDA.

Guidance for personal files, working papers, email, instant messaging, and how they organize their records will be provided. Guidance will also be provided to Senior Officials who are transitioning between roles at USDA, to ensure there is a creation of a clear and complete record for their activities in each role, as well as guidance when a Senior Official departs from USDA.

- ARS and ERS are developing plans to identify the policies/directives that were created and/or changed during this administration, review web content, and review mission-related milestones.
- FNS and APHIS will offer to brief Senior Officials on their RM responsibilities, the importance of safeguarding sensitive materials being changed over to the newly appointed administration, and proper overall management/handling of Agency records.
- RMA and APHIS will conduct face-to-face interviews with all in-coming and out-going Senior Officials and political appointees to ensure that records are maintained/transferred appropriately.