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2013 Senior Agency Official (SAO) Annual Report

EXECUTIVE REPORT

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Foreword

The *Managing Government Records Directive, M-12-18 (MGRD)*, jointly issued by the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA) on August 24, 2012, explicitly requires all agencies to designate a Senior Agency Official (SAO) to oversee the records management program for their agency and the implementation of the *Directive*. As part of the *Directive* requirements, NARA must produce a template for an annual report that each SAO will send to the Chief Records Officer for the U.S. Government. In August 2013, NARA sent a memorandum to Federal agency contacts (AC 29-2013) explaining the SAO annual report requirement and providing the inaugural template for FY 2013. NARA subsequently received 107 SAO annual reports. This document contains NARA's analysis of the 2013 SAO annual reports.

The intended purpose of this document is to use the content of the SAO reports to guide NARA in developing guidance, policies, and other projects designed to help Federal agencies transition to a digital government and improve records management as a whole. Additionally it should provide useful information for NARA staff assisting Federal agencies to find new ideas and solutions from each other, as well as, help inform other interested parties of what agencies are planning and implementing.

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Executive Summary

The *Managing Government Records Directive (M-12-18)* requires all agencies to submit to NARA an annual report outlining their progress toward implementing the provisions of that guidance. In 2013, the inaugural year of the SAO annual reporting requirement, NARA received 107 reports. This document contains NARA's analysis of those reports.

The analysis showed that agencies are:

- Working toward managing all email in electronic format by 2016 by using a variety of tools and methods.
- Interested in the Capstone approach ([NARA Bulletin 2013-02](#)) for managing email. Forty-two percent (42%) of agencies indicated they were either considering the approach or were currently implementing it. This is a remarkably high statistic given that the Capstone guidance was issued in August and reports were due in January. NARA believes the percentage has risen in the subsequent months since the submission of the annual reports.
- Beginning to explore and develop ways to manage permanent electronic records in electronic format by 2019.
- Deploying cloud services for email, administrative functions, and some mission-related activities.
- Concerned about their budgets. Overwhelmingly, the largest challenge agencies identified in meeting the *Directive* goals is the area of budget and funding.
- Concerned about other challenges including information technology issues, staffing, training, lack of standards, and conflicting priorities.
- Want assistance from NARA including technical guidance, policy guidance, site visits/consulting, and training.

Looking forward to next year's SAO reporting, NARA has implemented lessons learned from the analysis and changed the 2014 template. The next template will include questions to make it easier to measure progress in meeting the goals of the *Directive*. The next template will also solicit best practices or lessons learned from agencies that have implemented solutions to records management challenges.

I. Introduction / Background

The Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA) jointly issued the *Managing Government Records Directive (M-12-18)* on August 24, 2012. The *Directive* explicitly requires all agencies to designate a Senior Agency Official (SAO) to oversee the records management program for their agency and the implementation of the *Directive*.

The *Directive* required each agency to name its SAO by November 15th, 2012. The *Directive* requires each agency to reaffirm its SAO annually. NARA guidance indicated that the SAO must be in a position of authority to make adjustments to agency practices, personnel, and funding as necessary to ensure compliance and support the business needs of the department or agency. Some Cabinet departments elected to have SAOs at the component level and others determined that they would have one SAO only at the department level. Independent agencies named one SAO. NARA maintains a [list of SAOs](#) on its website. The list is dynamic and is updated as agencies change their SAO designations.

II. Methodology

Template

As part of the *Directive* requirements, NARA produced a template for the report. The purpose of the 2013 SAO report was to learn what agencies were planning, what they had achieved, and what progress was being made across the government towards meeting the *Directive* goals.

In August 2013, NARA sent a memorandum to Federal agency contacts ([AC 29-2013](#)) explaining the SAO annual report requirement and providing the template. The template was divided into three main sections: A) email, B) permanent electronic records, and C) cloud computing. Each section included specific questions addressing a particular area. Each section asked what challenges agencies faced in that area and what NARA could do to assist with these challenges.

Reporting

The original reporting period was October 1, 2013 through December 31, 2013. However, due to the government shutdown, NARA sent out another memorandum ([AC 01-2014](#)) extending the

The template was divided into three sections:

Section A was titled: Electronic Email Management (*Directive* Goal 1.2)

Section B was titled: Electronic Records Management for Permanent Records (*Directive* Goal 1.1)

Section C was titled: Use of Cloud Computing Services (*Directive* Action A4.1)

reporting period until January 31, 2014. A few agencies requested further extensions, which were granted as needed.

At the end of the reporting period, NARA received a total of 107 SAO annual reports. The reports varied in length and detail; some agencies provided brief generalizations while others provided an abundance of details. Several of the Department of Defense SAO reports were particularly noteworthy for their coverage and detail.

Working Group

NARA established a working group to undertake a comprehensive and systematic approach to reviewing and analyzing the reports. The working group divided itself into three sub-groups, each reviewing one section of the SAO reports.

III. Analysis and Results

This report contains the working group's high level observations regarding trends, analysis, and results for each section. Often, the working group found the valuable information from the reports in the responses describing "challenges" to achieving the goals and ways that "NARA could help". Therefore the analysis and results of this report contain two additional write-ups: one on challenges and one on assistance (see pages 12 and 13).

Some agencies provided descriptions of relatively mature programs that appear to be effectively meeting the provisions of the *Directive*. As a result, the analysis and results in this report contains narratives from individual SAO annual reports identified by the working group as worthy of highlighting as case studies. There is a case study table at the end of each of the three sections: A) Electronic Email Management; B) Electronic Records Management for Permanent Records; and C) Use of Cloud Computing Services.

Section A: Electronic Email Management

For this section, the reports ranged from agencies with minimal responses to agencies that described sophisticated records management programs managing email.

The template asked:

"Describe how your agency's email records are currently captured, retained, searched and retrieved." Ninety-three percent (93%) of agencies reported they were making progress in this area or outlined full details of their agency's email management. However, some agencies report

that – although they are addressing this goal – their current approaches often entail human involvement with the management of their email. Only seven percent (7%) provided either minimum or no details regarding their email program.

“Describe how your agency identifies temporary and permanent email records and preserves long-term and permanent email.” Eighty-three percent (83%) of agencies said they were making progress or provided a full description of their efforts in this area. Seventeen percent (17%) of agencies provided no or minimal descriptions.

The top challenges agencies identified in meeting the 2016 email goal were budget, conflicting priorities, lack of standards, training, and IT infrastructure or other technical issues. In terms of “how NARA can help” agencies generally indicated that they needed better or more technical guidance, policy/guidance, training, and site visits/consulting.

Capstone Approach

In August 2013, NARA issued a new policy for managing email called “Capstone” ([NARA Bulletin 2013-02](#)). Capstone is an innovative approach to managing email. It is not a technology. When adopting the Capstone approach, agencies must identify those email accounts most likely to contain records that should be preserved as permanent. Agencies determine Capstone accounts based on their business needs. Capstone officials will generally be the top-level senior officials of an agency, but may also be other key decision makers at lower levels of the agency.

When analyzing the SAO reports, NARA found that forty-two percent (42%) of agencies indicated they are either considering adopting Capstone or were currently implementing it. This is a remarkably high statistic given that the Capstone guidance was issued in August and reports were due in January. NARA believes the percentage has risen in the subsequent months since the submission of the annual reports.

Case Studies (Email)

A variety of approaches to email management are listed below as examples of how agencies are moving toward the 2016 goal. These examples contain text taken directly from their annual reports. This list is only a selection of those agencies that provided comprehensive details about their email management. There are other approaches that can achieve successful results. No endorsement of any of the particular approaches or products is intended.

Congressional Budget Office - CBO uses an email archive system that is monitored daily and captures email received. Per CBO’s schedule, permanent records are identified by sender and receiver, and include all of the email sent or received by certain employees in senior leadership positions. Permanent email is

transferred to NARA and temporary email is deleted by using interfaces included in their software.

Department of the Army - Army uses Defense Enterprise Email (DEE) to capture their email records. Policy requires emails be filed by users with associated case files, projects, etc. Journaling captures a duplicate of all incoming and outgoing email of select individuals and retains them on a separate server. DISA (service provider for enterprise email) retains those accounts. When an account is journaled all associated electronic records are retained, unmodified, for up to 10 years. Long term email may be sent by users to the Army Electronic Archives where the final disposition is applied. Army is applying the Capstone approach to permanent email.

Department of the Interior (headquarters) - In FY 2012, the Department of the Interior began development of the Departmental electronic eMail Records and Document Management System (eERDMS) program. The program consists of four initial component systems that support an enterprise records management solution for the Department and address the programmatic areas of records management, privacy and Section 508. Creating a comprehensive Department-wide approach to information management provides for a uniform framework that allows for economy-of-scale and improved efficiency. Currently, the eERDMS program captures all Departmental inbound and outbound electronic mail (email) through journaling with an annual volume of over 800 million emails items. In addition, eERDMS captures and manages 30 terabytes of electronic record content, 5 terabytes of social media content and 5 terabytes of other associated content.

Department of Justice - There are multiple email systems in DOJ and different approaches are used depending on the component and its needs. Examples of approaches:

- **Justice Communication System (JCS)** - This is an approach to email management that is in the process of implementation and involves the use of a private cloud architecture. The approach will consolidate 13 email systems that include multiple offices, boards, and divisions into one platform.
- **Senior Leadership Offices** - The Offices of the AG, Deputy AG, and Associate AG use the JCS email system. Their schedules address email and use a Capstone approach. Under this approach, the email is captured and locked down such that staff cannot delete or change email in any way once 30 days have passed.
- **The Executive Office for United States Attorneys (EOUSA)** - There is currently one central email exchange system for EOUSA and the 93 Offices of the United States Attorneys (USAMail). USAMail contains emails and attachments, calendars, contacts, notes, tasks, and other entries. It also retains email centrally through the use of a journaling and archiving solution.

- **Federal Bureau of Investigation** - Prior to July 2012, the FBI maintained an official “print and file” records retention policy for all email messages constituting federal records. Since then, a number of steps have been taken to move away from “print and file” policies for all record types to include email, including the development and deployment of a Record Marking Tool (RMT) for email. Records are uploaded to the FBI electronic recordkeeping system and assigned to the corresponding case(s) for appropriate management, including retrieval and disposition.

Section B: Electronic Records Management for Permanent Records

For this section, NARA’s analysis indicated that the majority of agencies are in the process of updating elements of their records management programs to meet the 2019 goal. NARA recognizes that this is a fairly long-term goal.

The template asked, “Describe how your agency’s permanent electronic records are currently captured, retained, searched, and retrieved.” Seventy percent (70%) of agencies answered they have started addressing the 2019 goal. A small number indicated that they have already achieved this goal, while others indicated that they have barely started. NARA anticipates future annual reports will provide a clearer picture of how agencies will meet this goal.

For challenges, agencies overwhelming cited budgetary, staffing, and training issues as primary factors limiting modernization of records management programs. Moreover, many agencies pointed to organizational issues and technological difficulties as major barriers to meeting the 2019 goal target date.

The SAO reports provided a variety of ideas for how NARA can help them meet their goal target date. Agencies suggested that NARA should increase its outreach by providing more technical guidance and training. Furthermore, agency responses suggested NARA should raise the visibility and importance of records management issues within the federal community by playing a greater leadership role. As a part of this activity some agencies indicated NARA should highlight and promote clear models of successful electronic records management initiatives, programs, and technological solutions.

Case Studies (Permanent Electronic Records)

A few notable approaches to the *Directive* goal on managing permanent electronic records are listed below. These examples contain text taken directly from their annual report. This list is only a selection of those agencies that provided comprehensive details about their management of permanent electronic records. There are other approaches that will achieve successful results as well. No endorsement of any of the

particular approaches or products is intended.

Government Accountability Office – DM/ERMS, GAO’s employee-wide document and records management system, manages all business- and mission-related records and emails of the Agency through automated retention rules and routines for electronic disposition. Permanent e-records, such as GAO orders, are stored electronically in DM/ERMS. The permanent emails of the GAO Executive Committee (i.e., senior executives) are currently captured, retained, searched, and retrieved electronically by their software product. When an email comes into the mailbox of an Executive Committee member, an automated program pulls an instance of it into that software product, where it will be stored for 20 years until electronically exported and transferred to NARA per the GAO records retention schedule. GAO also has an in-house digitizing project underway for its permanent facilities records. These records include building plans and specifications, leases, and other items of relevance to GAO’s facilities’ maintenance.

Department of Energy – Bonneville Power Administration (BPA) - Bonneville manages its permanent Federal records in electronic media in the agency Electronic Records Management System (ERMS). Status as a permanent record and retention are both applied as part of the process for uploading records to the system. Records maintained in ERMS cannot be deleted without administrator permissions, which are only allowed to Information Governance and Lifecycle Management (IGLM) personnel and certain IT staff supporting the ERMS. To protect the integrity of the records within ERMS, end users have read-only permissions for records retrieved in the search process. BPA’s IGLM team has begun the process of analyzing its current permanent physical Federal records for digitization.

U.S. Nuclear Regulatory Commission - The NRC generates many documents as part of its regulatory activities. Some come from licensees, the public, and other external sources, while the rest originate from NRC staff. To help manage its large document collection of permanent and temporary records, the NRC implemented ADAMS (**A**gency-wide **D**ocuments **A**ccess and **M**anagement **S**ystem) to provide:

- Library management services—document profiling (metadata), check-in, check-out, document security, and version control
- Records management services—managing documents declared as permanent and temporary records
- Public access to NRC records—making appropriate documents available to the public through the World Wide Web
- Document search to assist users with finding and retrieving documents of interest.

The NRC’s plan to modernize most components of its Information and Records Management program includes a digitization project. The major change expected in recordkeeping practices will be the automated capture of records into ADAMS Record Manager by identifying the retention and file schema at ingest.

Section C: Use of Cloud Computing Services

The *Directive* required NARA to incorporate into existing reporting requirements an agency update on new cloud initiatives, including a description of how each new initiative meets Federal Records Act obligations and the goals outlined in the *Directive*. Therefore, NARA included a question on cloud computing in the 2013 SAO reporting template. Agencies were asked to identify any existing use of cloud services or storage and the date of implementation.

Out of the 107 reports received, 70 agencies responded that they are using cloud services. However, the majority did not describe how they were using cloud services. Of the ones that did, cloud services are mainly used for email or administrative functions. Thirty-four (34) agencies indicated that records management was incorporated or in-progress for their cloud services.

Some agencies appeared unsure about how to manage records in the cloud. Some agencies misinterpreted the question as asking if records management for the entire agency was being done using cloud services.

Only a few agencies described any challenges for ensuring that cloud initiatives meet Federal Records Act obligations and the goals of the *Directive*. For those few agencies the challenges listed were IT infrastructure, security, and budget constraints.

Case Studies (Cloud Services)

A few examples of the reporting on cloud services by agencies are listed below. These examples contain text taken directly from the annual report. This is only a selection of those agencies that provided comprehensive details about their use of cloud services and records management.

Department of Defense - The Department of Defense is moving to a multi-provider Enterprise Cloud Environment to deliver the most innovative, efficient, and secure Information and IT services in support of the Department's mission.

The DoD CIO has the responsibility and authority to provide enterprise guidance to the Components for records in their cloud implementations, and to ensure compliance with the Federal mandates related to cloud computing that are discussed below.

The FY2012 NDAA (PL 112-81, "National Defense Authorization Act for Fiscal Year 2012") requires the Department to provide a strategy for migrating "defense data and government-provided services from Department-owned and operated data centers to cloud computing services generally available within the private sector that provide a better capability at a lower cost with the same or greater degree of security". The Department will use externally provided cloud services to leverage

the potential benefits while effectively managing risk to the DoD. Where appropriate, the Department will leverage commercially provided cloud services that meet cyber security, records management, and operational needs.

The DoD CIO has released a DoD Cloud Computing Strategy to drive the secure and effective adoption of cloud computing to improve the resiliency and performance of the Department's IT infrastructure. This strategy reflects the Department's commitment to comply with IM/RM policy and procedures.

Recently, the DoD CIO published a memorandum to further the DoD Cloud Computing Strategy and guide Components acquisition and secure use of cloud services. DISA has been designated as the Department's Enterprise Cloud Service Broker. The broker will help ensure consistent understanding of the policies, processes, mechanisms, and reporting requirements for RM.

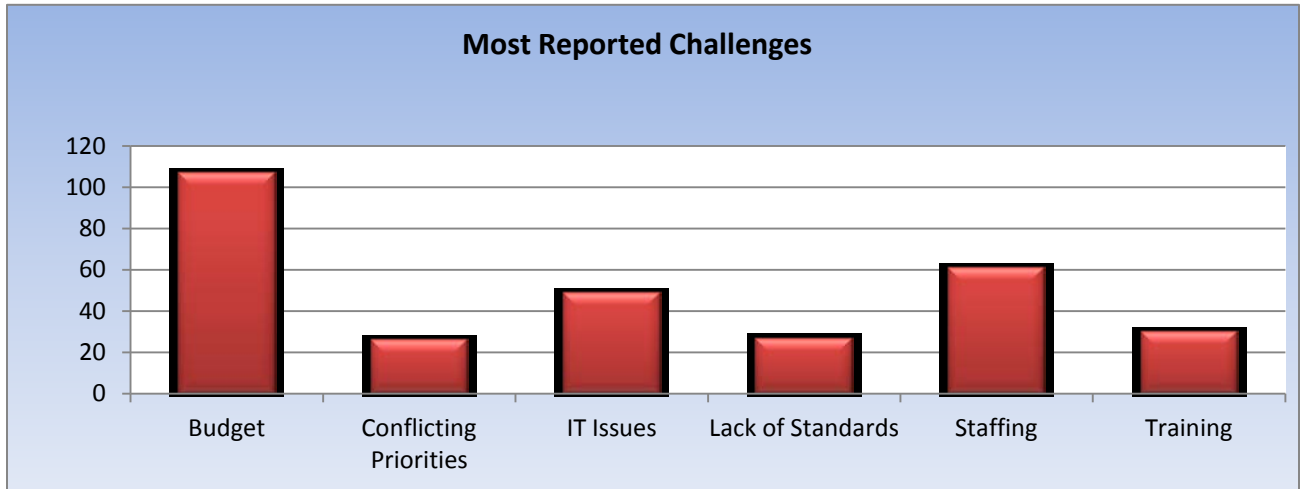
Social Security Administration - SSA's cloud computing strategy is fully incorporated into their IT governance processes, mechanisms, and IT Planning and Portfolio Management. The disciplines, technologies, and business models that form the basis of private cloud computing are integrated into their IT governance, management, and systems operations frameworks.

National Aeronautics and Space Administration - As an initiative, the Computing Services Service Office (CSSO) in the Office of the CIO is designated as the cloud computing program management office with authority to promulgate cloud computing strategy and related standards and approve, coordinate, and oversee acquisition of cloud computing services intended for Agency-wide use. NASA believes that some of the advantages of the emerging cloud model (e.g., lower costs, reduced cyclical capital investment requirements for system operation, increased availability of software-as-a-service offerings that replace aging in-house systems or address gaps in existing capabilities, etc.) will indirectly help facilitate improved records management on the part of employees by enabling, through new investment options, the availability of better tools, apps, and capabilities for the NASA workforce. The challenges of records management when using cloud are the same challenges faced when building and operating systems in traditional data centers and the records management responsibility still resides with the system owners.

Challenges Agencies Face

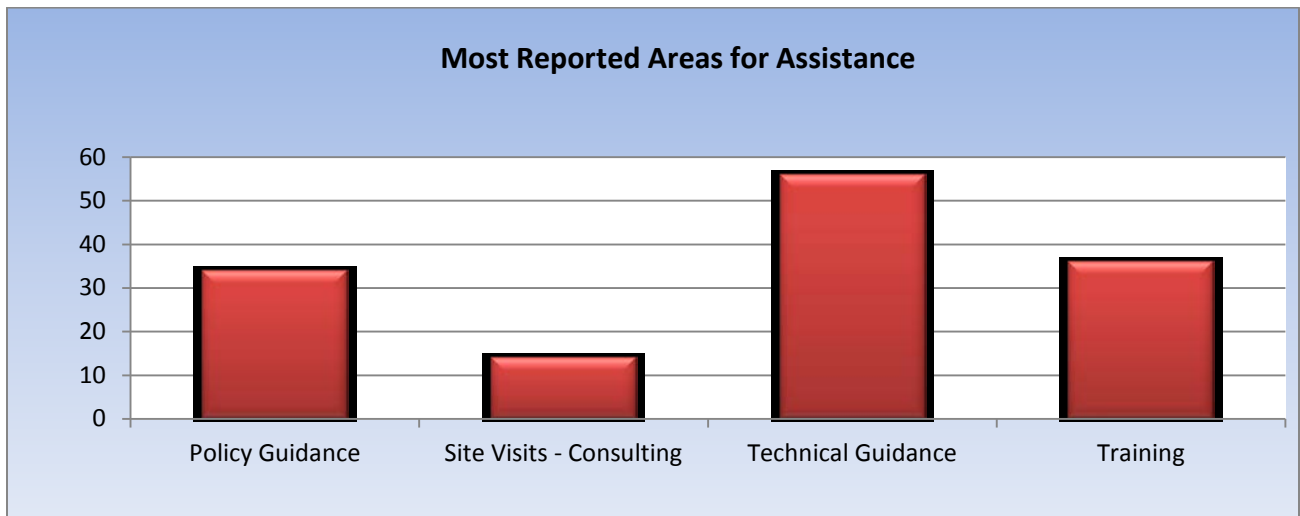
Each of the three template sections asked what challenges agencies were facing for that particular area. The chart below shows the most frequently noted challenges combined from all three sections. Some reports mentioned the same challenge in two, or even all three, sections of the template. Staffing includes a lack of skilled records management staff well versed in

electronic records management as well as a general lack of needed staff overall to fulfill mission of the function.



How NARA Can Help

Each of the three template sections asked how NARA can assist agencies in that area. The chart below shows the most frequently noted areas that NARA can help agencies, combined from all three sections. For example, 36 reports indicated that NARA could provide additional training. In terms of the area of “Policy Guidance” – agencies sometimes requested more specific or improved policy and guidance – not necessarily more. Technical guidance referred to issues such as file conversion, product information, transmission of large electronic files to NARA, and long-term management of such files.



One of the trends in the reports was requests for examples of agencies that had “solved the problem” or could provide best practices or lessons learned about email management, automated records management technologies, or incorporating records management into cloud solutions. Agencies want to know if anyone else has found creative solutions to similar records management challenges they are facing.

IV. Looking Forward to FY15 and the 2014 SAO Report

The SAO reports provide some valuable insights into the needs of individual agencies as well as the collective needs of the federal records management community. The narrative format used in this first SAO annual report allowed for wide flexibility and variations in detail. However, the template, did not allow the working group to draw easy conclusions about how the federal government is meeting the goals of *Directive*. Therefore NARA will change the template for the 2014 SAO annual report to incorporate the lessons learned from the 2013 report.

One of the purposes of the SAO annual report was to learn what agencies were planning and what they had achieved. The reports contained that information, but reported in different ways requiring a great deal of resources to analyze. The next template will contain more quantitative questions asking agencies their status in meeting the *Directive* goals. In this way, the next SAO annual report will contain information to be used as metrics to show what progress is being made across the government toward meeting the *Directive* goals.

The *Directive* contains specific 2014 due dates for actions related to training, including certification for agency records officers and establishing records management training for appropriate staff. Training was identified as one of the main ways NARA can help agencies. The next template will contain questions about training to help NARA learn how it can improve in this area. The template will also ask questions to help determine what progress agencies are making toward meeting the training target dates.

In addition to training, agencies also asked for more information on best practices, lessons learned, and creative solutions to similar records management challenges. Therefore, NARA will change the template for the 2014 SAO annual report to solicit this kind of information and make it publicly available for agencies to use. NARA may ask agencies with model practices to participate in webinars, teleconferences, or write blog articles to share their knowledge and experiences.

For some agencies, one of the outcomes of the SAO reporting process was a strengthened relationship between the agency records officer and SAO. When communicating the next template to both SAOs and agency

FY 14 Template

- Metrics on progress towards *Directive* goals
- Solicit best practices and models to share
- Strengthen SAO and ARO communication on records management programs

heads, NARA will stress the importance of the report in the hope that it will lead to new or renewed engagement by the SAO with the agency records management program. Such involvement by the SAO is instrumental in providing support to records management program staff.

SAOs are crucial to achieving the *Directive's* vision of moving Federal recordkeeping from a largely paper environment to a modern, efficient, and accountable electronic information framework. The SAO reports are crucial to understanding how the government is making this transition. Therefore SAO reports are required on an annual basis to NARA, who reports to OMB and oversight committees. NARA remains committed to the successful implementation of the *Directive* as records are truly the foundation of open government, supporting the principles of transparency, participation, and collaboration.