



Consumer Financial
Protection Bureau

1700 G Street, N.W., Washington, DC 20552

March 19, 2021

The Honorable David S. Ferriero
Archivist of the United States of America
National Archives and Records Administration
700 Pennsylvania Avenue, NW
Washington, DC 20408

RE: Senior Agency Official Annual Report

Dear Mr. Ferriero:

In accordance with the June 28, 2019, Office of Management and Budget (OMB) / National Archives and Records Administration (NARA) Transition to Electronic Records Memorandum (M-19-21), the Consumer Financial Protection Bureau (CFPB or the Bureau) conducted an evaluation of its records and information management program and has developed this Senior Agency Official (SAO) Annual Report. This SAO Annual Report documents the Bureau's continued progress toward the successful implementation of OMB / NARA M-19-21.

Name of SAORM: Donna Roy
Position Title: Chief Operating Officer
Address: Consumer Financial Protection Bureau
1700 G Street, NW Washington, DC 20552

1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.

- The Consumer Financial Protection Bureau

Please provide a list, and also indicate any that are new or have been changed due to reorganization or other circumstances.

2. Has the COVID-19 pandemic changed any policies or practices related to records management at your agency?

X Yes

- No
- Do not know

Please explain your response (include details of specific challenges, if applicable):

The Records and Information Management program modified the Records Liaison Officers (RLO) training and workshops to support the remote environment, instead of specifically meeting with RLOs within their offices, reviewing records in file cabinets, and transferring hardcopy records, the RIM program focused on electronic records, email management, electronic messaging systems, file plans, data/records management, and folder structures updates.

3. Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)

- Yes
- No
- Do not know

Please provide details on what support is needed:

In October 2019, the Bureau established the Office of the Chief Data Officer (OCDO) within the Operations Division by elevating the Chief Data Officer as a peer to the Chief Information Officer and a direct report of the Chief Operating Officer, aligning the Bureau’s companion data and compliance functions. The OCDO is currently comprised of the Records and Information Management (RIM), Freedom of Information Act, Privacy, Data Policy and Governance, Paperwork Reduction Act, and Knowledge Management programs. Additional staffing is needed within the RIM program to develop the Bureau’s Controlled Unclassified Information program.

4. Has your agency made progress towards managing all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)

- Yes
- No
- Do not know

Please explain your response (include specific goals and example metrics):

The Bureau continues to make progress towards M-19-21, 1.2. Since our last update, CFPB implemented Microsoft Office (365) as our primary system to manage permanent

electronic records in an electronic format. In addition, the Bureau migrated permanent and temporary records from our shared drives to Microsoft Office (365), and applied retention policies on folders within the system. The system has the capability to auto-classified and apply the proper retention policy to newly created records which will allow for an effective and efficient transfer of electronic records to NARA.

5. Has your agency made progress towards managing all temporary records in an electronic format by December 31, 2022? (M-19-21, 1.3)

- Yes
- No
- Do not know

Please explain your response (include specific goals and example metrics):

The Bureau continues to make progress in managing temporary records in electronic format by digitizing temporary records with long retention schedules, and ensuring temporary records schedule meet the needs of the Bureau. In addition, the Bureau no longer stores any temporary records at Federal Records Centers operated by NARA. The Bureau currently manages nearly ninety five percent of its temporary records in digital formats, with the implementation of Microsoft Office 365, and we anticipate a steady reduction in hard copy temporary records over the next few years.

6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?

- Yes
- No
- Do not know

Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes. If No or Do not know: Please explain.

The Bureau has already invested significant resources in obtaining and implementing Microsoft Office 365, however there are additional compliance functionality that will be added to enhance users experiences, records and information management compliance, and support staff with identifying and marking Controlled Unclassified Information (CUI) documents and emails.

7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)

- Yes

- No
- Do not know

Please explain your response (include specific goals and example metrics):

The Bureau does not operate an agency records center, and does not store any temporary or permanent records at NARA operated Federal Records Centers. The Bureau's only commercial records management storage facilities are managed by NARA approved 36 CFR 1234 Iron Mountain locations.

8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and outgoing senior officials* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?

*Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions.

- Yes
- No
- Do not know

Please explain your response (include specific details of policies and procedures):

The Bureau's Records and Information Management program ensures that all Senior Officials' federal records created or received in all formats are identified, captured, and preserved in the system in which they were created or received. In addition, specific records and information management training is provided throughout the year. This includes documenting Senior Officials public services, use of personal email, electronic messaging, and other recordkeeping requirements. RIM actions include the following:

- Conducting records and information management briefings as part of Senior Official's orientation;
- Conducting groups and in person records and information management briefings for Senior Officials;
- Conducting mandatory web-based records and information management training for Senior Officials annually;
- Publishing email, text and instant messaging guidance bi-annually;
- Conducting records management departure briefings for Senior Officials

- Conducting RIM sweeps of departed Senior Officials offices;
- Applying permanent record holds on Senior Officials accounts; and
- Conducting RIM reviews of laptops of departed Senior Officials.

9. Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?

- Yes
 No
 Do not know

Please explain your response (include details of specific challenges, if applicable):

The Bureau continues to make progress towards fully electronic recordkeeping with the implementation Microsoft Office 365, best practices, and guidance forthcoming, the Bureau is well on its way to meeting this goal.

10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?

- Yes
 No
 Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

The Bureau does not have any suggestions for improving engagement at this time.

Contact information:

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Sincerely,



Digitally signed by
DONNA ROY
Date: 2021.03.12
09:49:29 -05'00'

Donna Roy

Chief Operating Officer