



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: Howard Spira

Position title: Chief Information Officer

Address: 811 Vermont Ave., NW, Washington, DC 20571

Office telephone number: 202-565-3844

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

Please list them below:

Export-Import Bank of the United States

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,*
 - i. Export-Import Bank's Records Management Policy has been updated in FY 2015 to include instructions for handling Transaction-related e-mail.
 - ii. The Electronic E-mail Management Implementation Strategy document has been created and disseminated for review and approval to the Office of General Counsel (OGC) and the office of the Chief Information Officer (OCIO).

- *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*
 - i. Permanent e-mail records are transferred for preservation to an EMC Documentum-based Permanent Electronic Email Archives System at the Ex-Im Bank prior to transfer to NARA after 15 years, per disposition instructions; The EMC Documentum Records Manager (RM)/Retention Policy Service (RPS) components are implemented to automate the retention policy process.

- ii. Temporary Transaction-related e-mail records are maintained in the designated electronic Central Records Repositories for seven years after cut-off (Transaction Termination)
 - iii. Temporary administrative Case-related e-mail records are maintained in the designated electronic Central Records Repositories for seven years after cut-off (Case Closure or Termination).
 - iv. All other Temporary e-mail unrelated to specific transactions or cases are maintained in-place within Microsoft Office 365 until cut-off (deactivation of the e-mail account) and for seven years after cut-off in exported .pst format on a dedicated Legal Hold server.
- *possible implementation of the Capstone approach for applicable agency email.*

Ex-Im Bank began preparatory work towards the implementation of GRS 6.1 (Capstone) approach in FY 2015 – internal discussions for identification all affected accounts in consultation with the NARA Appraisal Archivist and the development of the Electronic Email Archives System. We plan to complete the implementation in FY2016.

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

In 2016 Ex-Im Bank plans to complete the implementation of the GRS 6.1, including:

- i. Identification of the Capstone accounts defined in GRS 6.1 and obtaining NARA’s concurrence by submitting the NA Form 1005 (08-15);
- ii. Implementation strategy document reviewed and approved by the stakeholder: OGC, OCIO, SAO, and Records Officer;
- iii. Technical implementation and deployment of the new electronic Permanent Email Archives System;
- iv. Continued performance of the Standard Operating Procedures concerning the electronic management of all temporary e-mail; adjustment of the retention term from five to seven (7) years, as mandated by GRS 6.1, Item 010.
- iii. Annual audit of all aspects of the e-mail records management operation implementation.

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.

- i. Ex-Im Employee Rules of Behavior prohibit the use of Personal email to conduct government business. All staff are reminded of this rule in the annual Ethics Training administered by the OGC. They are also reminded that in the event of an inadvertent error (unintentional use of personal email for business) the resulting email exchange must be forwarded to the employee's official email account within 20 days.
- ii. The General Counsel, the Chief of Staff and the Chairman of Bank have been additionally briefed on this rule of behavior and the remedy (forward correspondence to the official email account within 20 days) for an inadvertent error.
- iii. Ex-Im Records Management Policy will be updated to include this topic as part of the regular annual review in FY2016.
- iv. Ex-Im Records Management Training materials will be updated to include this topic for the FY2016 mandatory all-staff Records Management 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).

- i. The permanent e-mail of the Board of the Directors of the Bank and the Chairman of the Bank (captured at the point of entry) is implicitly scheduled in the Bank's media-neutral Records Schedule DAA-0275-2014-0001. All other email is captured at the point of entry and managed "in-place," using Microsoft Office 365 capabilities or stored in the electronic system.
- ii. Work is in progress to schedule all e-mail of the Bank, including that of the Board of the Directors of the Bank and the Chairman of the Bank, using GRS 6.1 in FY2016. The email of the Chairman, political appointees and executives, and other senior management staff will be managed using the Capstone approach, per GRS 6.1, Item 010.
- iii. Social Media Policy, governing texts, chats, and instant messaging, has been drafted by office of Communication, circulated to all Bank staff, and is awaiting final adjustments and approval. It will be put in effect in FY2016.
- iv. The Bank's Records Management Policy specifies the management approach to all electronic messages and contents the same as the management of email messages, including the storage in the Central Records Repository as appropriate.

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.*

Two agency-specific, media-neutral records schedules, DAA-0275-2014-0001, and DAA-0275-2015-0001 were approved for the Bank by the Archivist in 2014 and 2015 respectively. These schedules comprehensively schedule all known records of the Bank, other than those records scheduled by GRS.

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

The Bank performs annual audits of its records schedules. Accordingly, we shall perform a full records schedules audit in FY2016 and confirm that all existing paper and other non-electronic records remain appropriately scheduled. Should any unscheduled records be discovered, they will be promptly scheduled as necessary.

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,*

i. Ex-Im Records Management Policy regulates the handling of all Ex-Im records, including the permanent electronic records. The policy is reviewed annually and revised as required.

- *use of any automated systems for capturing electronic records,*
- *providing access / retrievability of your electronic records, and*
- *establishing disposition practices for agency electronic records.*

ii. Records Management is in the process of implementing a set of Permanent Electronic Records Management Systems for the management of all permanent records of the Bank: Board Documents Archives System, Permanent Email Archives System, and Permanent Records Archives System to comply with the 2016 and 2019 records management targets of the Presidential Directive.

iii. The EMC Documentum-based Board Documents Archives System electronic records repository has been implemented and activated in FY2015 for the management of the permanent records of the Bank's Board of Directors and other Boards and Committees. The Board Documents Archives System allows full text search and retrieve. The access level to the system is role-based, defined in the security policy of the application.

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

In FY 2016 Records Management will complete the implementation of Permanent Email Archives System and initiate the development of Permanent Records Archives System to meet the presidential directive. These, and the Board Documents Archives System, together will manage all permanent electronic records of the Bank in an electronic format. The retention and disposition of the records within the management systems will be implemented using EMC Documentum Records Manager and Retention Policy service functions.

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.

- i. A significant effort in transitioning to a digital government is digitization of the active temporary paper records and non-record working files. Along with the reduction of storage space originally required for the maintenance of the actively used records, digitization allows for the ease of searching and improves business unit collaboration and productivity. The primary challenge in this continuing effort is the education of the business users in establishing systematic naming conventions for the resulting electronic instances of the records.
- ii. Another implementation challenge is the design of the logical linking of the electronic transaction or case records to the small number of paper records for the respective transaction or case that carry the original "wet ink" signatures of the responsible parties. Such paper records are required for legal purposes in select International commerce transactions or cases.
- iii. A replacement to one of the legacy electronic business applications – Financial Management System – Next Generation (FMS-NG) has been deployed in FY2014 and continued to undergo enhancements in FY2015. Reliance on paper records has been substantially reduced.
- iiii. The legacy Application Processing System (APS) functionality for business process initiation will be replaced in FY2016 by the new C3 system, incorporating a newly implemented Content Management System. The system will process case-related information from initial customer contact through application receipt, case evaluation, credit analysis, and authorization.
- iv. The bank is currently undertaking a project to reduce paper records submissions requirements from customers where the submission is another agency's federal record. A Memorandum of Understanding (MOU) has been put in place with Customs and Border Protection (CBP) to negotiate an Inter Connection Agreement/Interconnection Security

Agreement to allow ExIm to access electronic versions of export documents filed with CBP that must currently be manually submitted by Bank customers to the Bank to prove an export occurred.

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.*

- i. Executive staff exit procedure was reviewed, updated, approved by OGC, and implemented.
- ii. Office staff of the Chairman of the Bank have been specifically briefed in FY2015 on the records management procedures and records accessioning logistics at the records cut off points.
- iii. Two members of the Bank's Board of Directors departed the Bank in FY2015 and have been de-briefed. Their respective records have transitioned into the custody of the Records Management and the *Ex-Im Senior and Executive Staff Transfer or Separation Records Management Check-List* has been signed by OGC and Records Officer for each of the departing staff members.

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.*

- i. As the end of the Presidential administration nears in FY2016, additional records management briefing(s), as necessary will be given by the SAO to the departing appointee, executive and senior staff, as well as the new incoming staff for these positions
- ii. Records Management will structure specific training presentation on the procedures and assistance that may be required with the processing of off-boarding and on-boarding of the appointed, executive and their staff.
- iii. A special-purpose training session for the affected Records Liaison Officers (RLO) will be scheduled in FY2016 to support senior staff records audit with the emphasis on staff transition.