



*Senior Agency Official for Records Management
2017 Annual Report*

The [OMB/NARA Managing Government Records Directive \(M-12-18\)](#) requires Senior Agency Officials for Records Management (SAORM) 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* 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 January 8, 2018 and reports are due back to NARA no later than March 16, 2018.

NARA plans to post your 2017 SAORM report on the NARA website upon receipt. Please ensure that your agency's report is a publicly releasable version. This action is in the interest of transparency in Government and to promote collaboration and communication among agencies. NARA intends to list any non-responding agencies in a summary report and on the website.

Instructions for Reporting

- This template covers progress through December 31, 2017.
- Please be brief and precise in your answers. Limit answers to each question to no more than 500 words.
- Please complete the questions/items below and send the report to PRMD@nara.gov. Include the words "SAORM annual report - [Agency 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 SAORM
Howard Spira
- Position title
Senior Vice President / Chief Information Officer (CIO)
- Address
811 Vermont Ave., NW, Washington, DC 20571
- Office telephone number
202 565-3844

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

Export & Import Bank of the United States

2. Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)

- Yes
 No

YES - As part of the comprehensive Electronic Records Management (ERM) Program, in compliance with the Presidential Directive for Federal Records, the Bank executed system planning and specification for the four major modules of the ERM: Board of Directors Archives System (BDAS), Permanent Email Archives System (PEAS), and the Permanent Records Archives System (PRAS). All three components of ERM use the OpenText Document capabilities for the archival implementation. Two of the components: BDAS and PEAS are in production.

The third and final component, PRAS, will electronically archive all permanent records of the agency, other than the materials of the EXIM Board of Directors, archived in BDAS, and the Capstone permanent email archived in PEAS. At the time of this report, PRAS is in requirements definition and system design phase. It will be fully deployed and in use before December 2019. The bulk of the scrum-based system development will take place in FY2018.

All application components of the ERM will implement the Records Management lifecycle using the capabilities of the OpenText Records Manager (RM) and Retention Policy Services (RPS). This capability will be deployed with the customized policies for each of the EXIM permanent records types during the FY2018 and FY2019.

Full deployment of the PRAS component will complete the development of the Records Management specialized ERM system and begin the lifecycle maintenance phase, encompassing phased annual permanent records ingest, records management for format currency, records integrity audits, and development of policies and ingest interface adaptations for new permanent records types, as well as development and test of the capability to transfer permanent records to NARA’s custody.

The Implementation Dates are shown in Table 1 below. EXIM has completed Items 1 through 3. The implementation of Item 4 is in progress.

**Table 1.
Progress Towards Managing all Permanent Electronic Records in Electronic Format**

Item	Overall Goal	Target Date
1	By 12/31/2013 each agency will develop and begin to implement plans to achieve transaction of all permanent records being managed electronically. Agencies should also consider the benefits of digitizing permanent records created in hard-copy format or other analog formats.	12/31/2013
2	All Federal agencies must establish a method to inform all employees of their records management responsibilities in law and policy, and develop suitable records management training for appropriate staff.	12/31/2014
3	Federal agencies must manage all email records in an electronic format. Email records must be retained in an appropriate electronic system that supports records management and litigation requirements (which may include preservation-in place models), including the capability to identify, retrieve, and retain the records for as long as they are needed. Beginning one year after issuance of tis Directive, each agency must report annually to OMB and NARAA the status of its progress toward this goal.	12/31/2016
4	By December 31, 2019, all permanent electronic records in Federal agencies will be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format.	12/31/2019

3. Has your agency developed plans or taken actions to evaluate and implement the digitization of permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, analog audio)? (M-12-18 Goal 1.1)

- Yes
- No

The annotated Briefing Materials of the Bank’s Chairman (term 2009-2015), that are permanent record have been digitized.

All other hard copy permanent records created prior to approval of the Bank’s media neutral records schedule in FY2015 will not be digitized and will be accessioned to NARA as paper. The volume of the permanent records generated and managed by the Bank is very small as compared to the overall records volume.

Beginning in FY2015, all permanent records of the Bank are managed in electronic formats. By the end of FY2019 a dedicated Documentum-based Electronic Records Archives will be used for the lifecycle management of the non-email permanent records.

4. OMB M-17-22 required agencies to create reform plans that may result in re-organizations and the elimination of offices and/or functions. Where necessary, has your agency taken steps to ensure that recordkeeping requirements and other records management needs have been or will be accounted for and implemented when making these changes?

- Yes
- No

In FY2017 EXIM implemented organizational realignments that resulted in lateral shifting of several Senior Vice President portfolio responsibilities and realignment of subordinate business units and between business Offices.

Records Management division had ensured and continues to ensure that the Capstone email account permanent records for all staff positions scheduled as Capstone is appropriately captured on the basis of the operational roles being performed by the account owners, rather than on the basis of an individual identity of the owners.

Records Management division ensured that all business units resulting after the realignment continue to have active Records Liaison Officers, responsible for maintaining the currency of each business unit’s File Plan and internal records management practices and being available to their colleagues as a primary resource for records management concerns.

5. Have you, as the SAORM, taken steps to ensure that your records management program has the strategic direction, support, and resources it needs to be successful? (see: NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html>)

- Yes
- No

The SAORM advocates for the records management program ensuring that adequate resources are embedded into the agency’s Strategic plan.

- 1) The EXIM Bank's Senior Agency Official for Records Management (SAORM) carries the overall agency-wide responsibility for records management resources and the implementation of records management initiatives focused on meeting the next milestone of the presidential Directive for the FY2019;
- 2) The Bank has in place Records Management Program, directing the agency's Records Management activities;
- 3) By December of 2019 the Bank will accomplish the full-scope management of the agency's electronic records in accordance with Government-wide requirements, including:
 - a) Managing all permanent electronic records electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format; and
 - b) Managing all email records electronically and retaining them in appropriate electronic systems that support records management and litigation requirements, including the capability to identify, retrieve, and retain the records for as long as they are needed;
- 4) The bank ensures the ability to access, retrieve, and manage federal records throughout their life cycle regardless of form or medium:
 - a) the existing paper records reside at the Federal Records Centers (EXIM's Permanent paper records) and the Iron Mountain records centers (EXIM's Temporary paper records);
 - b) the electronic records are stored in the electronic records systems, as applicable.
- 5) The agency's records are treated as information resources with appropriate considerations of information security, privacy, records management, public transparency, and supply chain security issues throughout the records lifecycle from creation to disposition.

Records management functions and retention and disposition requirements will fully incorporate into information life cycle processes and stages, including the design, development, implementation, and decommissioning of information systems, particularly Internet resources including cloud-based services to the maximum extend.

EXIM supports the transition to electronic government, by allowing individuals or entities that deal with the Bank the option to submit information or transact with the Bank electronically, when practicable, and to maintain records electronically to the greatest extent feasible within operational and business practices constraints.
- 6) EXIM had, in a timely fashion, established and obtained the approval of the Archivist of the United States for retention schedules for Federal records – all records of the Bank are scheduled. The standing retention schedules are reviewed annually to assure that these schedules are current and adequate for the Bank's records management. Specifically, the Bank recently requested and received approval of the Archivist of the United States for two stand-alone Records Schedules - the records of the Inspector General Office in FY2016, and ICRAS Reports in FY2017, both hitherto were scheduled within the Bank's comprehensive Records Schedule DAA-0275-2014-00.
- 7) EXIM diligently insures the proper and timely disposition of Federal records in accordance with the applicable approved retention schedules. The Bank's File Plans are reviewed annually to ensure appropriate records disposition.
- 8) EXIM is committed to providing training and guidance, as appropriate, to all agency employees and contractors regarding their Federal records management responsibilities. All Bank staff, federal and contractor, receives annual general records management training. The training materials are reviewed and updated annually. The Records Liaison officers receive annual specialized training and additional training and consultations as needed. New staff, including congressional appointees, receive new employee training within 30 days of coming on-board.

6. Have you, as the SAORM, ensured that all incoming and outgoing senior officials* receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements.

*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

Incoming Senior Officials receive an in-person customized Records Management orientation presentation. The content of this presentation is reviewed and adjusted annually and whenever a significant number of new Senior Staff begin work at the Bank. The most recent example of such briefing is attached.



[Slides added at end of document]

Senior Staff Briefing
Records Management

The Senior Staff separating from the Bank receive a one-on-one separation briefing and are issued a standard senior personnel check-out form enumerating the records cleanup and turn-over actions that must be completed prior to departing employment with the Bank.

7. Is the records management program and related requirements included in your agency's Information Resource Management Plan or an equivalent information management plan? (OMB Circular A-130, Managing Information as a Strategic Resource)?

- Yes
 No

Adequate resources are planned and made available for the Records Management Program. The Program encompasses execution of routine Records Management functions as well as implementation of new Records Management initiatives and directives as these are issued by the White House, OMB and NARA. Specifically the resources are allocated to:

- 1) Daily Records Management operations in support of the agency mission;
- 2) Development, commissioning, and maintaining Electronic Records Archives Systems dedicated to the Lifecycle Management of inactive permanent electronic records;
- 3) Development and administration of the annual mandatory agency-wide Records Management training and several other types of specialized Records Management training, updated and administered as required;
- 4) Implementation of the Controlled Unclassified Information handling.
- 5) Records Management Division's support of the agency's compliance with the PRA.
- 6) Periodic auditing and adjustments of agency-wide records management practices, periodic reviews and revisions of agency-wide records management policy and standard operating procedures; research of the up-to-date Records Management practices, systems, and tools to support to the agency.

8. What policies, guidance or support do you need from NARA to ensure a successful transition to fully electronic recordkeeping? (NARA Strategic Plan. Goal 2.4)

EXIM success in transitioning the permanent records to fully electronic recordkeeping would benefit from:

- 1) the availability of NARA Web service for accessioning transfer of electronic records,
- 2) the publication of a Document Type Definition (DTD) or XML schema in support of accessioning transfers of permanent electronic records from federal agencies to NARA, and
- 3) the availability of a test site, where EXIM could verify interface and format compatibility with NARA's ingest systems and the readiness of EXIM's internal Electronic Records Archives implementing EXIM records lifecycle management for permanent electronic records.



Reducing Risk. Unleashing Opportunity.

Records Management Briefing



- Overview of the Records Management Tasks and Responsibilities
 - What is a Record?
 - Records Liaison Officers
 - Capstone Email Accounts
 - Social Media Accounts
 - Separation Check-List for Executive and Senior Staff Exit Briefing
 - Questions

Records Management



What is a Record?

Documents, including email, are **RECORDS** when they:

1. Are created or received in the **transaction of Agency business**;
2. Are appropriate for **preservation as evidence of the Agency's functions, decisions, and/or activities**;
3. Support **financial obligations or legal claims**;
4. Communicate Export Import Bank **policies, procedures, and guidance**, or
5. Intergovernmental communication - This includes documents, email received from or sent to **Congress, the White House, Federal agencies, foreign governments, U.S. businesses, and State and Local Governments.**

Federal records can be in handwriting annotation document, paper, electronic or some other media. Federal records may not be removed from Government custody, nor may they be destroyed without a records retention schedule that has been approved by the Archivist of the United States.

Records Management



Permanent and Temporary Records

Business records of the Chairman and the records of the other members of EXIM Board of Directors are **Permanent**, including business email. These records are sent to the National Archives and Records Administration (NARA) for permanent keeping.

All other records are **Temporary** and may be destroyed as defined in the Records Retention Schedule after requirements are met.

Records Management



Records Liaison Officers

Records Liaison Officers (RLOs) are the designated business personnel bearing the primary responsibility for coordinating the management of the active records of a business unit and creating the File Plan.

1. The executive secretary to the Chairman serves as the RLO for the Office of the Chairman and the Office of the Vice Chairman.
2. The secretaries or personal assistants to the individual members of the Board of Directors serve as RLOs for each member.
3. A designated member of the OGC staff serves as an RLO with the responsibility for the records of the Board of Directors as an entity, such as the records of the Board Meetings.
4. All EXIM RLOs receive annual training.

Records Management



Capstone Email Accounts

1. All Board member's email account are "Capstone" accounts.
2. All business-related email in a Capstone email account is a permanent record.
3. An [email record](#) consists of any document that is relevant to agency's business, created, transmitted, or received on an e-mail system, including the message text, any attachments, and transmission information (metadata).

Records Management



Business Email Tips

- 1. Must use EXIM email account to conduct EXIM business. EXIM policy explicitly prohibits the use of personal e-mail to conduct bank business**
2. If a personal e-mail account was inadvertently used for business, you must forward the entire business email exchange to your EXIM email account within **twenty (20) days**.
3. Review your EXIM email and as much as practical, delete personal emails and other emails unrelated to EXIM-business, such as promotions, advertisements, and irrelevant mass mailings as soon as it is no longer needed

Records Management



Social Media

Social Media Includes, but is not limited to

- Video/Photo Sharing – YouTube, Vimeo, Instagram, Flickr;
- Blogging/Microblogging – WordPress, Blogspot, Twitter, Tumblr;
- Social Networking - Facebook, LinkedIn;
- Social Bookmarking – Reddit, Pinterest;
- Other blogs, message boards and discussion forums.

Official Social Media Postings are Records and preserved by the Office of Communication

- The use of Social Media for official purposes must be **pre-authorized** by the designated Bank official.
- Text Messaging is **NOT** authorized for official use at this time.

Social Media use is Governed by the EXIM Policy

- Business–related Social Media also should be preserved. Forward business-related texts, if any, to your EXIM email account.

Records Management



Separation Check-List for Executive and Senior Staff Exit Briefing

- When Board members separate, putting records in order is an important activity, The separation checklist describes tasks you should complete to ensure your records are properly managed as you leave Federal service.
- Federal records and information are the property of the Government and must stay under agency control.
- If Board Members wish to take extra copies of any documentary materials with you, you need to obtain permission from the General Council Office.

ITEMS/PEOPLE OF SIGNIFICANCE



Senior Agency Official for Records Management

Howard Spira
Chief Information Officer, SVP

Records Officer

Andy Chang
Director of Information and Records Management

HIGH-LEVEL SUMMARY/TAKE-AWAYS



1. A record is any artifact (electronic or otherwise) pertaining to the business of EXIM.
2. All board business e-mail are CAPSTONE and are permanently retained.
3. The use of **personal email** accounts is **NOT permitted** for the conduct of **EXIM business**.
 - * If a personal e-mail account was inadvertently used for business, you must forward the entire business email exchange to your EXIM email account within **twenty (20) days**.
4. Records belong to the agency and should not be removed without proper clearance
5. Reach out to our records officer with any questions

QUESTIONS?

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1-800-565-3946 | [exim.gov](https://www.exim.gov)

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EXIM Points of Contact:

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Records Schedule

EXIM Bank Records Schedules

[2015 Transaction Records Media Neutral Schedule](#)

[2014 Media Neutral Records Schedule](#)

[General Records Schedules of the US Government](#)

Additional Records Management Information

Records Management –related information can be found on the Information and Records

Management Division Web Page of EXIMCONNECT

<http://eximconnect.bankhq.exim.gov/offices-divisions/office-chief-information-officer/records-management>