



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: Terrell Dorn

Position title: MD, Infrastructure Operations/Chief Agency Privacy Officer

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

Government Accountability Office

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.*
- **GAO Response:** We currently have an email policy for all of the business- and mission-related emails in the organization which follows:

GAO employees (and contractors) are expected to identify e-mails (sent and received) that have record value (e.g., those required to support audit findings and those that document GAO's other business transactions) and save them in GAO's official records management system within 180 days, upon receipt or transmittal. Non-record (i.e. transitory) emails may be retained in Outlook for 365 days and will be purged thereafter. GAO's e-mail policy complies with National Archives guidance and regulations.

All of these emails reside in our enterprise-wide Document Management/Electronic Records Management System (DM/ERMS) and are retrievable and accessible. Likewise, emails of our senior executives in Archive Manager are retrievable as well, if needed. We treat emails as we would any other record; they are scheduled by their content—not their format. Emails are entered into the records management system by the business owner, and fall into one of three of our retention policy buckets. Emails are disposed of with our business-, mission-, or policy-related records based on associated retention timeframes according to our legally vetted disposition process and the NARA-approved GAO records retention schedule. Emails are handled efficiently by the automated disposition routines in DM/ERMS along with documents and other content in the system.

Additionally, we also use a product called Archive Manager to automatically capture, store, archive, and export the emails of our Executive Committee and their deputies to ensure their preservation as permanent records. We have been doing this since 2010 for those individuals at the highest management level, who are responsible for running the Agency and making the strategic decisions. The emails of the Comptroller General, the General Counsel, the Chief Operating Officer and the Chief Administrative/Financial Officer and their deputies are being captured. We have also captured the emails of several former executives as part of the archiving process. In 2013 we conducted an assessment of the automated routines from the capture of the incoming and sent mail in Archive Manager to ensure that senior executives' emails were being captured as they should.

Permanent record emails in the Archive Manager will be transferred to the National Archives and Records Administration (NARA) in 20 years, which is the cutoff timeframe for transfer of custody as prescribed by our NARA-approved records retention schedule. As noted above, we have also inventoried all of the senior executives' emails in Archive Manager. We know the date ranges of all emails being captured, so at the appropriate time in 20 years, we will export the these emails and get them to NARA either by file transfer protocol or other transfer medium.

Our Executive Committee, including the Comptroller General, is considering expanding Capstone to other executives' roles at GAO.

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

GAO Response: In addition to what we are already doing in Archive Manager, we have been discussing the implementation of Capstone at GAO to include more GAO executives' roles—such as the Managing Director role—with our appraisal archivist and other internal stakeholders. We have presented Capstone to our Chief Administrative Officer and his deputy, our Office of General Counsel, and the GAO Executive Committee (EC) to gain everyone's approval. If granted EC approval to move forward on Capstone, we will communicate one-

on-one with those designated senior executives to explain Capstone to them. We are also working with our Information Systems and Technology Services group to ensure that Archive Manager is upgraded in time to house the new designees, and that it works properly with Windows 7.

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?

X Yes No

Please provide a brief description of the actions taken, such as establishing policies and providing training.

GAO Response: We have developed guidance for electronic messaging (including email, voicemail, text, chats, and instant messaging) for our employees and have shared that with our Chief Administrative Officer and his deputy. That new guidance was communicated to the GAO employees through **Notices**, our internal communications vehicle, on November 30, 2015. We do not allow any GAO employee to access their external personal email accounts or non-GAO approved systems (Yahoo, Gmail, etc.). We also do not allow .PSTs. As for GAO-approved email, we regard that to be the preferred method of communication with clients and anyone with whom we conduct business. Our email policy has been described above thoroughly in Question 2, and mission- and business-related emails are housed in DM/ERMS, our enterprise system.

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).

GAO Response: We do not currently have instant messaging capabilities. We do not allow GAO employees to access their external personal email accounts (Yahoo, Gmail, etc.). The GAO-approved email system is the preferred method of communication with clients and anyone with whom we conduct business. If someone inadvertently uses text to conduct business, for example, our new electronic messaging guidance states that they should put that content into our Document Management/Electronic Records Management System, DM/ERMS. We consider texts, chats and instant messages to be ephemeral, and do not envision senior executives will use these media much. However if senior executives do use texts and instant messages, they will be following the new electronic messaging guidance, dated November 30, 2015, as well. We have controls on DM/ERMS through our automated disposition routines and our reports that we can produce from the system to quality check records in the disposition queue. Our technology staff is responsible for ensuring there are no gaps in the automated capture process in Archive Manager.

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*)

X Yes No

5a) *Provide a list of the actions your agency, components, or bureaus have taken to meet this goal.*

GAO Response: GAO has met this goal. We currently have a comprehensive records retention schedule approved by the National Archives and Records Administration (NARA). GAO's retention schedule was revised in 2014, with approved pen and ink changes in 2015, in which all of our paper and electronic records have been scheduled by their content, not their medium.

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

GAO Response: We currently have a comprehensive records retention schedule approved by NARA, in which all of our paper and electronic records have been scheduled by their content, not their medium. There are no other tasks that we need to implement.

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*)

X 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.*

GAO Response: Our GAO records policy implemented in 2007 stated that the official GAO record is the electronic one and that all mission- and business-related records are to be captured in our enterprise-wide system, Document Management/Electronic Records Management System (DM/ERMS). DM/ERMS is GAO's official records management system. With DM/ERMS, it is no longer necessary to print records for paper files, nor is it necessary to maintain official paper files.

GAO moved to DM/ERMS in order to:

- Capture and preserve documents/records that are important evidence of how GAO conducts business;

- Protect the integrity of the documents and the files;
- Enable staff to share documents/records both locally and across headquarters and the field offices;
- Provide ready access to record materials required to support GAO's engagements and business activities and processes.

We also have a GAO-approved order for the program, **0410.1, The GAO Records Management Program**, which outlines the management aspects of the records operation along with roles and responsibilities and other criteria, and we developed standard operating procedures for the daily operational routines. We currently have a comprehensive records retention schedule approved by the National Archives and Records Administration (NARA), in which all of our paper and electronic records have been scheduled by their content, not their medium or format. We capture all permanent records in our records management system, and catalog them with a policy profile. The system has built-in calendars which will provide us the date for transfer of custody to NARA for all permanent records. All of these records are accessible and retrievable through the search capability of DM/ERMS and through the file plan in the Records Management Administration Tool. The file plan in the Records Management Administration Tool also allows us to upgrade the retention of specific mission or administrative records/case files that are designated as historically significant from temporary to permanent. We have a legally vetted disposition process in place for our records. We have a high-level inventory of all senior executive emails in Archive Manager. We have tested the export functionality of that system, and it functions as intended. When these emails reach the 20-year transfer of custody cutoff, we will transfer them to NARA.

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

GAO Response: We capture all permanent records in DM/ERMS, catalog them with a policy profile, and the system has built-in calendars which will tell us the date for transfer of custody to NARA for all permanent records. All of these records are accessible and retrievable through the search capability of DM/ERMS and through the file plan of the Records Management Administration Tool. We have a legally vetted disposition process for paper and electronic records which we have had in place since 2012 when we began the automated disposition process in the electronic records system. We also have a high-level inventory of all of the senior executive emails in Archive Manager. We have tested the export functionality of that system, and it worked successfully. When these emails reach the 20-year cutoff, we will transfer them to the National Archives.

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.

GAO Response: We support the National Archives and Records Administration (NARA) for putting the **Managing Government Records Directive** in place, but it is unfortunate timing that it occurs during a time of fiscal austerity and when the focus in information management is on cybersecurity. It is encouraging that NARA is providing a platform for the small agency records centers and archives that cannot afford to implement a tool. We believe that NARA should expand its oversight of information governance by taking a more global perspective recognizing synergies between records management, privacy, FOIA, and information security and put processes in place that capitalize on the harmonization of these information management disciplines.

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.*

GAO Response: As an independent, nonpartisan agency, the change in Presidential administration does not have a significant impact on GAO and its Senior Agency Officials as it does in executive agencies. The Comptroller General's term is 15 years, transcending multiple Presidential administrations. GAO's work does not change with the change in the administration. We still perform engagements and conduct audits and investigations for Congress. We use the same standard operating procedures when any executive leaves GAO. We have a departing employee procedure which includes ensuring that the agency's records have been safeguarded and are passed to the employee's supervisor or successor. We also coordinate with the departing executive to ensure that all of his or her documents and emails are captured by our Document Management/Electronic Records Management System (DM/ERMS). Passwords for all databases and any documents captured by DM/ERMS must be provided to the departing employee's supervisor. We use the same records processes and procedures as those articulated above.

- 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.*

GAO Response: Please refer to the answer above.