



Senior Agency Official for Records Management 2020 Annual Report

The National Archives and Records Administration (NARA) requires Senior Agency Officials for Records Management (SAORM) to provide an annual report demonstrating how agencies are handling important records management initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the Federal Government in managing its records and the transition away from paper to digital formats, and to identify best practices and model solutions within Federal agencies.

On June 28, 2019, the Office of Management and Budget and the National Archives issued a memorandum: *Transition to Electronic Records* (M-19-21) to ensure that all Federal records are created, retained, and managed in electronic formats by December 31, 2022. This year's SAORM report provides an opportunity for agencies to report on plans and progress towards the milestones and target goals in this memorandum, as well as other important records management initiatives.

The reporting period begins on January 19, 2021, and reports are due back to NARA no later than March 19, 2021.

NARA plans to post your 2020 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 both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, and other aspects of agency records management programs.
- 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 rmsselfassessment@nara.gov. Include the words "SAORM 2020 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: Linda Dent
- Position title: Acting Deputy General Counsel
- Address: 1775 Duke Street, Alexandria, VA 22314

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

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

National Credit Union Administration

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

- Yes
 No
 Do not know

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

The NCUA has used electronic information systems to create, capture, and maintain records for many years, and most of the agency's business processes are electronic. In general, the NCUA's technology enables staff to access records remotely, which facilitated a smooth transition to the agency's mandatory offsite posture in March 2020. However, at that time, the NCUA was receiving a few records by mail, e.g., invoices from some vendors. The agency adjusted processes and procedures, and now digitizes mail and receives more correspondence electronically.

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:

The SAORM is a member of the NCUA Enterprise Data Governance Council (EDGC). The EDGC is comprised of agency managers representing stakeholder offices, including the Office of the Chief Information Officer (OCIO), and supports the NCUA Chief Data Officer to achieve the goals of the agency's Enterprise Data Program. Among its other responsibilities, the EDGC champions enterprise data governance in and across NCUA offices.

We appreciate NARA's sharing best practices for information governance frameworks.

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 NCUA Records Management Program Instruction, an agency-wide policy, requires the agency to conduct business electronically to the maximum extent possible. As noted above, most NCUA business is conducted electronically. The NCUA has inventoried electronic information systems that house electronic records, including permanent records, and aligned them with applicable records schedules. The agency also continues to expand the use of office file plans to manage records, including permanent records, in an electronic format. Records program staff, working with office Records Liaisons, have approved file plans for most of the NCUA's offices, with work proceeding on the remaining file plans.

The NCUA utilizes NARA's recommended Capstone approach for managing email of designated officials as permanent records and email of all other staff as seven-year records. NARA approved the agency's Capstone implementation in 2016. Records program staff are responsible for compliance with Capstone (e.g., tracking incoming and separating Capstone officials) and work with OCIO to implement Capstone. The NCUA has developed procedures for the transfer of Capstone official email to NARA.

Records program staff are involved in the NCUA's System Development Life Cycle (SDLC) process. The SAORM is a member of the Information Technology Prioritization Council (ITPC). The ITPC is comprised of agency senior managers and allocates budgetary resources to support the agency's IT needs, including management of permanent electronic records. Records program staff participate and address records management in the Enterprise Solution Modernization (ESM) initiative, a multi-year effort to modernize mission-related systems. Systems developed in the ESM initiative will provide more functionality for the management of electronic records, including permanent records. Records program staff are also involved in the current modernization of the agency's email system and are developing recommendations to utilize the increased records management functionality in the modernized system, including for permanent records.

The NCUA made its first transfer of permanent electronic records (cancelled Instructions) to NARA in FY 2020. In addition, the agency has developed procedures for migration of records, including permanent records, into new systems for long-term preservation. The NCUA uses its eLibrary, an electronic records archive, to house and provide access to certain permanent records with NARA-required metadata.

The NCUA also continues to accession eligible analog permanent records to NARA. Subject to a return to on-site operations, the agency plans to inventory remaining analog permanent records and determine whether to store them at a Federal Records Center (FRC) prior to the end of 2022, or digitize them consistent with NARA requirements.

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):

Please see the response to question 4. In addition, Records program staff conducted their first annual RIM effectiveness evaluation of an NCUA office in 2019 and evaluations of two offices in 2020. The 2020 evaluations focused on records management in the mandatory off-site posture due to the pandemic. The 2019 and 2020 evaluations confirmed proper records management by the offices. Records staff plan to conduct RIM effectiveness evaluations of two offices in 2021.

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 work of the ITPC, the ESM initiative and the current modernization of the agency's email system are examples of the NCUA's commitment to investing IT resources to support the transition to electronic recordkeeping. As noted above, systems developed in the ESM initiative and the agency's modernized email system will provide greater records management functionality.

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 NCUA does not have agency-operated records centers. The agency utilizes commercial records storage facilities to store certain records of its Asset Management and Assistance Center (AMAC). These commercial facilities meet NARA requirements. The NCUA uses NARA FRCs for the remainder of its off-site storage. The agency plans to disposition off-site records at their current 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):

Per the NCUA Records Management Program Instruction, the NCUA briefs incoming senior officials on their recordkeeping responsibilities. Records program staff document the meetings for accountability. As noted above, the NCUA utilizes Capstone to manage email of designated officials as permanent records and all other staff email as seven-year records, and has developed procedures for the transfer of Capstone officials' email to NARA.

Separating staff, including senior officials, complete an online form that supports the proper retention of records. If a departing employee wishes to take copies of records with them upon separation, Records program staff, with input from FOIA program staff, review such requests to determine if the departing employee may remove the copies. Per the Records Management Program Instruction, exiting senior officials receive a records management briefing from the

SAORM or Records Officer, which is documented for accountability. Records program staff work with staff of departing senior officials and OCIO to prepare any permanent records for transfer to NARA.

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 NCUA is on track to meet the requirements of OMB-NARA M-19-21 for fully electronic recordkeeping. Legacy information systems require the development of additional processes and procedures for the agency to implement disposition consistently. In addition, further involvement of Records program staff in the SDLC will enable the NCUA to acquire and deploy new systems with more robust records management functionality.

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):

We recommend that NARA continue to make SAORM meetings available remotely after agencies return to on-site operations, to facilitate participation.