



***U.S. Office of Personnel Management  
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 the U.S. Office of Personnel Management (OPM) is achieving the goals of the *Directive* and other important initiatives as identified by NARA.

OPM acknowledges this report (or a reasonable facsimile) will be posted to the NARA website in the interest of transparency in Government and to promote collaboration and communication among agencies.

If you have questions, please contact OPM's Records Manager, Ms. Alicia Hoefke, at [Alicia.Hoefke@OPM.GOV](mailto:Alicia.Hoefke@OPM.GOV) or 202-606-2514.

Sincerely,

A handwritten signature in blue ink, appearing to read "Donna K. Seymour".

Donna K. Seymour  
Chief Information Officer and  
Senior Agency Office for Records Management



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Name of SAO:

**Ms. Donna K. Seymour**

Position title:

**Chief Information Officer, U.S. Office of Personnel Management**

Address:

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**202-606-2150**

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

*Please list them below:*

**U.S. Office of Personnel Management**

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.*

**OPM is actively pursuing use of the Capstone approach for electronic messaging. In FY15, OPM drafted an electronic messaging policy, as well as a list of Capstone officials and Capstone-level accounts, which are in the process of being cleared. OPM's Acting Director and other senior leaders were trained on the Capstone approach, explaining that they will be Capstone officials and the requirements of Capstone officials.**

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

**OPM expects to establish backend controls and disposition rules to implement Capstone for emails, chat sessions, and attachments, which will make those records more easily accessible and retrievable by authorized personnel. These backend controls will be at the account level, enabling implementation of GRS 6.1, items 010 and 011. OPM also plans to provide training to agency employees on proper email management.**

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.*

**OPM incorporated the 2014 amendments regarding the use of non-official accounts into its electronic messaging policy, which is being cleared.**

**OPM employees are instructed not to use personal accounts except under exigent circumstances (e.g., the employee is at a remote location and does not have access to an office laptop or other email device and must make contact on official business conduct business on an emergency basis). In the event that such exigent use occurs, the employee must either copy their official electronic messaging account in the original creation or transmission of the record; or forward a complete copy of the record to an official electronic messaging account within 20 days after the original creation or transmission of the record.**

**Violation of this policy could result in the agency pursuing disciplinary action appropriate to the circumstances.**

**The email-related training provided to the Acting Director and other senior leaders included the 2014 FRA requirements regarding non-official accounts.**

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).

**OPM's electronic messaging policy was drafted in FY15. The Acting Director and other senior leaders were trained on their electronic messaging responsibilities. Also, OPM also established role-based rules for access and disposition within OPM's electronic messaging systems.**

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.*

**For many years, OPM's mission and business activities have remained substantially the same. This means that OPM's records have not changed in nature or function, and most of its records have been scheduled. In FY15, OPM submitted schedules as it became aware of unscheduled non-electronic records.**

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

**OPM will continue to schedule records as additional records are identified. Although the nature of OPM's business has remained the same, its operations have moved from a paper to an electronic environment. OPM's goal is to supersede its existing records schedules with media-neutral schedules to accommodate the change in practices.**

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,*
- *use of any automated systems for capturing electronic records,*

- *providing access / retrievability of your electronic records, and*
- *establishing disposition practices for agency electronic records.*

**In FY 2015, OPM began updating its records management policies, starting with its electronic messaging policy, to ensure automated systems incorporate proper records management lifecycle controls, including the implementation of disposition within systems. OPM is also building these requirements into its life cycle management and system development life cycle processes.**

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

**OPM is updating all of its records management policies, including retirement and transfer policies for both electronic and non-electronic records.**

**OPM expects to establish backend controls and disposition rules in automated systems, starting with the implementation of Capstone, which will make those records more easily accessible and retrievable by authorized personnel.**

**Electronic records will remain in their native formats except under specified circumstances.**

**All new records schedules will support this new policy by being media neutral.**

**OPM expects to assess all of its databases for adherence to records management policies.**

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.*

**OPM is challenged in implementing the MGRD due to limited resources and its legacy systems for which records management controls may be expensive and timely to implement.**

**However, given the OPM data breaches in 2015, there is a heightened awareness of the value of records management to reduce the exposure of sensitive information in OPM's automated systems. Implementation of the MGRD is supported by the fact that Records Management personnel are actively engaged with personnel responsible for enterprise architecture, systems development, network management, and agency communications, as well as legal counsel.**

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.*

**OPM's Records Management personnel are very engaged with information technology personnel which enables OPM to implement records management capabilities and responsibilities throughout OPM's networks. OPM is also updating records management policies and training senior officials on the Capstone approach to managing electronic messages.**

**All of OPM's FY 2015 efforts to update records management policies and complete media-neutral schedules are designed to support a healthy records management program that, in turn, will support proper records management through transitions such as the change in Presidential administration.**

- 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.*

**To facilitate a compliant transition in Presidential administrations, OPM will update its employee departure policies and procedures to ensure no federal records are removed from the agency. OPM will also train IT staff to improve consistency and efficiency of capturing the records of departing senior officials.**