



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: Janice L. Glick

Position title: Chief Counsel to the Chair

Address: Occupational Safety and Health Review Commission
One Lafayette Center North
1120 20th St NW 9th Floor
Washington, DC 20036-3457

Office telephone number: (202) 606-5370

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

Please list them below:

Agency: Occupational Safety and Health Review Commission (OSHRC)

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*)

X 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.*

OSHRC is a micro agency whose work primarily results in published judicial decisions that are available to the public. Following our 2014 report, a draft email retention plan was completed and has been submitted to the agency Chair. In addition, it is anticipated that we will likely adopt the Capstone approach to email retention, and note that email access/retrievability is presently available. Other

aspects of email management are under development (i.e. automated system use and disposition practices).

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

Steps will commence to finalize, approve, and implement the draft email retention plan.

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.

All agency personnel were formally notified of the adoption of a policy implementing this requirement by email on March 23, 2015.

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).

OSHRC personnel do not conduct official business by text, chat or IM. Email is the exclusive means of electronic communication, which would be captured directly by the Chair's office under the Capstone approach or transferred by Chair's office personnel within 20 days. Chair's office personnel use government-issued computers and cell phones for government business-related communications.

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.*

In 2013, NARA conducted a review of the OSHRC records management business processes. Agency personnel have met with relevant staff concerning NARA records review.

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

OSHRC plans to achieve final implementation of this goal by confirming that unscheduled records identified during NARA's review will be properly scheduled.

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.*

All permanent electronic records are being retained in an electronic format.

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

Same as above.

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.

As indicated in prior reports, OSHRC has undertaken steps to develop an e-filing system for all Commission cases. As part of this system, case tracking would be moved to the cloud, and it is anticipated that the electronic version of case files would eventually constitute the official case records. The system would be designed to comply with

NARA electronic records management requirements. It should be noted, however, that full implementation is budget-dependent.

8. With regard to records management, is your agency preparing for the upcoming change in Presidential administration?

X 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.*

OSHRC senior officials, who are political appointees, do not necessarily change with a change in Presidential administration. The political appointees serve staggered six-year terms as established under the Occupational Safety and Health Act of 1970. It is not anticipated that any incumbent senior officials will be departing during the upcoming 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.*

Under the Capstone approach, electronic records of Chair's office personnel are captured and retained on an ongoing basis, not subject to deletion or destruction.