



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: Neil K. Melick

Position title: Director of Administration

Address: 1331 F. Street NW, Suite 1000, Washington DC 20004-1111

Office telephone number: 202-272-0042

1. What are the agencies, components, or bureaus covered by this report and your position as SAO? *Please list them below:*

The United States Architectural Barriers and Compliance Board (United States Access Board (USAB))

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:*

- The USAB established a formally approved Records Management Program Directive effective in December 2013. This directive establishes the principles, responsibilities, and requirements for managing the records and information of the USAB. This directive includes the Records Management Handbook, which provides guidance that is developed on a continual basis and issued as a supplement separate from the directive. The Records Management Handbook includes Section 3.5 Email Records.
- All USAB email is managed in the cloud where it is processed through a record management solution (BridgeLogiQ Suite) that will automatically capture all USAB emails, and provides access to and enables users to retrieve emails.
- The USAB Records Management Handbook, Section 3.5 Email Records covers the disposition practices to be used for USAB email that reside in the record management solution.

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

- Implement the USAB record management solution (BridgeLogiQ Suite) for email.
- Submit an Email Records Retention Schedule to NARA.
- Implement an Email Records Retention Schedule for applicable agency email upon approval by NARA.

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.

- *Establishing policies:* The Access Board has drafted an agency-wide policy which instructs employees to use their official accounts for business purposes. Accordingly, all federal records originate from official accounts. This policy is conveyed during new hire orientation for all new staff. Our policy reads as follows:
“Do not use non-Access Board accounts/folders to conduct agency business. As staff receive work-related e-mails through a non-Access Board account, they should forward the e-mail to their Access Board account and handle it in accordance with our agency’s e-mail policies and procedures to ensure the proper preservation of any e-mail that may constitute an agency record.”
- *Encouraging compliance through simplifying email access:* The Access Board uses Outlook Office 365, a cloud-based email platform that provides remote, in-browser email access. This has eliminated the need for employees to forward Access Board materials to their personal accounts for home access.
- *Electronic Messaging / Social Media:* The Access Board has drafted an agency-wide policy which will include guidance related to social media tools and/or applications. This will be a two phase approach investigating and researching on mobile devices and the best approach to capture this information. At this time it is our practice to consider the information captured social media tools and/or applications as transitory.

The Access Board feels that agencies cannot navigate these emerging technologies without additional direction from NARA. Case studies from agencies successfully managing text messages would help us identify the appropriate procedures to retain these messages.

- *Providing training:* The Records Management team has trained all staff on how to view their email archival settings within our RMA application. During this training, staff were briefed on their responsibility to avoid using their personal emails to conduct agency business. New hires receive similar training and instruction regarding their responsibilities under the Federal Records Act.

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).

The Access Board has commissioned a robust RMA application that provides internal controls for managing electronic messages. The RMA combines a role-based approach to capturing email records from senior agency positions with a content-based approach that assigns email records to the appropriate record series. The accounts of senior officials are automatically retained, while individual messages from other users are simultaneously sorted into their appropriate series and managed on our cloud servers in compliance with our draft email retention schedule.

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.*

The Access Board has developed records schedules for all unscheduled records and non-electronic records as follows:

- N1-0588-2011-1 (Access Board Records)
- DAA-0588-2013-0001 (Audio Visual Records)

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

The Access Board has met this goal and does not currently have any unscheduled records.

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.*

- **Establishing formally approved electronic records policies:** We have documented electronic records policies outlined in internal records management documents. Our file plan for electronic records is shared with staff and staff receive regular training and updates.
- **Use of automated systems for capturing electronic records:** We have a designated architecture for storing permanent electronic records on local servers. These servers are mirrored in the cloud through BridgeLogiQ. Descriptions of record material and guidance for storing electronic records on our servers are outlined in our internal Records Management handbook. Our records management team monitors our servers to ensure that staff are complying with our file plan.
- **Access and retrievability of electronic records:** Our RMA solutions allow us to filter files and emails by date and subject. We anticipate that full-text search will be possible on our email records before December 31, 2016. The structure of our files on the server reflects our agency's business functions. Our intuitive hierarchy ensures that we can easily retrieve permanent records relating to a specific subject. Our filing conventions were established in collaboration with our General Counsel to ensure ease of use and compliance with potential FOIA requests.
- **Disposition practices for agency electronic records:** Our RMA schedules records for disposition actions according to the US Access Board's approved records schedule and NARA's General Records Schedule.

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

The USAB goal is to perform testing and implementation of our RMA application (BridgeLogiQ) during FY16-FY17.

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.

NARA's 15-year transfer period for email and electronic records - The suggested 15-year retention period proposed by NARA for email records creates a burden on small micro-agencies both in maintaining the integrity of their permanent records as well as the associated storage costs.

The Access Board is especially concerned that the 15-year transfer period does not align with our approved records schedule and its 10-year transfer period for paper and other electronic records. This makes our task as records managers more difficult, especially in light of the fact that our agency has many essential business functions that involve both paper and electronic components.

Budgetary and staffing concerns about the transition to digital government – Our concerns about the 15-year rule are part and parcel of our larger concerns about the budgetary impact of new electronic recordkeeping requirements. As a small agency with 30 employees and a proportionally small budget, a 15-year transfer period, rather than the 10-year period described in our approved records schedule, would translate to a 50% annual increase in storage costs for our digital records. This is a true burden on our IT budget and staff.

A major challenge with the transition to digital government is the difficulty in projecting the volume of electronic records, and associated storage costs. Another challenge is the labor required to implement and maintain our RMA in order to comply with NARA directives. The Access Board recognizes the need for a designated FTE position within the 0308 occupational series, and has accordingly created a developmental position to perform records management functions.

Institutional changes required to ensure a smooth transition to electronic records – The Access Board has found that the transition to digital government is ultimately a cultural transition. Agency staff tend to have a more intuitive understanding of paper records, and have difficulties identifying digital record material. In order to assure compliance with directives relating to digital government, ongoing records management training is an absolute necessity.

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.*

The question is not applicable to the Access Board as we do not have presidential appointees.

- 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.*

The question is not applicable to the Access Board as we do not have presidential appointees.