Provide the following information (required):

- Name of SAO Official: Celia Y. Doggette (2017 Internal Revenue Service Senior Agency Official Report)
- Position title: Director, Identity and Records Protection
- Address: 1111 Constitution Ave, Washington, D.C. 20224
- Office telephone number: (202) 317-6451

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

   Internal Revenue Service (IRS)

2. **Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)**

   X Yes
   ☐ No

   Please explain your response:

The IRS is committed to managing all permanent electronic records in electronic format by December 31, 2019.

IRS uses Exchange 2016 Outlook email system to manage email. Retentions are set at the account-level based on IRS' Capstone approach. All mailboxes of designated Capstone officials are automatically and permanently maintained without burden/dependency on the end-user, and will be transferred to NARA in electronic format (as approved by NARA on 09/25/2017), under Job No. GRS 6.1-0058-2017-0001.

In FY 2017, the IRS Records and Information Management (RIM) Program Office started a multi-year initiative to create master files plans for every IRS business unit (BU). This ensures that each of the BU's Records Control Schedules (RCS) are up-to-date and reflect current recordkeeping practices. This also ensures that all agency permanent records (in addition to Capstone email) are identified and transferred to NARA according to approved disposition authorities and format requirements.

IRS is leveraging SharePoint's records management functionality to ensure all unstructured data, including permanent records, residing in SharePoint Site Collections (or targeted for SharePoint maintenance) have appropriate retentions and that dispositions are electronically carried out. RIM has established records management language in the IRS Enterprise Architecture to ensure that other recordkeeping systems follow established policies for the management of electronic data.

This work is expected to run through FY 2018, but progress is incremental and in full compliance with 2019 M-12-18 requirements, including the management of electronic permanent records in an electronic format.

3. **Has your agency developed plans or taken actions to evaluate and implement the digitization of permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, analog audio)? (M-12-18 Goal 1.1)**

X Yes
☐ No

Please explain your response and include any obstacles you are facing in planning or implementing digitization initiatives.

IRS looks for opportunities to eliminate paper and use electronic recordkeeping to the maximum extent possible. Much of the agency's trend from paper to electronic recordkeeping is driven by expected and necessary business process re-designs. RIM, as part of regular IRS BU engagements (and as part of comprehensive RCS and files plan reviews started in FY 2017), seeks to identify where digitizing records should be considered, not only from a records management standpoint, but also from agency economic and efficiency perspectives. These efforts, though, are generally limited to the identification of e-recordkeeping or digitization efforts going forward (to the extent budget and resources allow) and do not involve the digitization of legacy paper records still in IRS custody (and appropriately maintained and safeguarded for eventual NARA transfer).

4. **OMB M-17-22 required agencies to create reform plans that may result in re-organizations and the elimination of offices and/or functions. Where necessary, has your agency taken steps to ensure that recordkeeping requirements and other records management needs have been or will be accounted for and implemented when making these changes?**

X Yes
☐ No

Please explain your response:

IRS agency reorganizations, office closures, and the elimination of business functions are all triggers for special records management attention. RIM policy and guidance are found on the RIM SharePoint Site, including steps to ensure staff and/or successor office/program know exactly what records existed prior to the transfer, what records will be acquired, and what records will be going into storage. In addition, RIM Records Specialists regularly meet with IRS business units and their employees through training and evaluations, and re-organizations and office moves are anticipated and addressed in a timely manner. RIM staff actively participate in move planning meetings, provide records storage and disposal assistance, and otherwise help direct records management compliance in the wake of these situations. RIM staff ensure records inventories and files plans are updated, and that any necessary RCS revisions are addressed.

5. **Have you, as the SAORM, taken steps to ensure that your records management program has the strategic direction, support and resources it needs to be successful?** (See: NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html)

X Yes

☐ No

Please explain your response

I take very seriously my role as the IRS SAORM and find every opportunity to champion and advocate for the RIM Program's goals and objectives. IRS has established a sound RIM Program by setting a strategic vision thru compliance with the Federal Records Act, NARA regulations and the Managing Government Records Directive (M-12-18), adherence to a strategic framework (eRecords Road Map, Strategic Approach, Implementation Plan), and ensuring appropriate/dedicated resources to address records matters. This Program is recognized as a trailblazer in the Federal records management community for all it has been able to achieve with internal attention and support given it by key agency stakeholders (such as IT and Office of Chief Counsel), including the Office of the Commissioner. IRS RIM remains committed to participating in an electronic records management community of practice and sharing optimal solutions for an effective and compliant records management program for the 21st Century.

6. **Have you, as the SAORM, ensured that all incoming and outgoing senior officials* receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements.**

*****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.

X Yes

☐ No

Please explain your response:

The IRS Human Capital Office (HCO) gives an onboarding presentation to all executives new to IRS. This presentation provides highlights of IRS policies and regulations, including restrictions on personal email account use. IRS personal email guidance is also provided in RIM Internal Revenue Manual (IRM) 1.15.6, *Managing Electronic Records* and provides reference to policy mirrored in other agency IRMs. This policy includes limiting personal email use for business purposes to emergency situations, and the requirement to forward all email records to an official electronic messaging account no later than 20 days after the original creation or transmission of the record.

Senior (and appointed officials) are required to complete the Enterprise Learning Management System (ELMS) Records Management Mandatory Briefing Course #62965, *Records Management Awareness* within 10 days of job assignment. This briefing provides the official with the statutory requirements and employee actions required to comply with federal records management standards. Completion of Mandatory Briefings/Training is tracked within ELMS and successful completion is monitored at the Commissioner level and within each BU and business operating division (BOD).

IRS regularly monitors the capture of Senior Official and executive email accounts as these roles are newly filled/vacated. RIM receives reports from IRS Executive Services at least monthly and tracks the opening/closing of email archiving tickets processed by IT. As part of IRS email management policy (under a Capstone approach), new Senior Official email accounts are configured for permanent records capture. Records created throughout this process are created, stored, and managed in Outlook for eventual NARA transfer.

The IRS updated its separating employee clearance (SEC) policy and procedures in FY 2016, to include a records management checklist (IRS Form 14757, *Records Management Checklist for Separating Employees)* for all separating employees that provides employee and manager certification that all records (including those stored on individual hard drives) are appropriately secured prior to equipment turn-in. Form 14757 certification is also part of the Department of the Treasury's HR Connect System used for documentation of all personnel actions, including employee separation. This process update helps ensure a more standardized and pro-active agency-wide governance process. Additionally, the IRS Records Officer conducts exit interviews with all separating senior officials. These exit interviews include the potential review and approval of requests to remove personal papers.

7. Is the records management program and related requirements included in your agency's Information Resource Management Plan or an equivalent information management plan? (OMB Circular A-130, Managing Information as a Strategic Resource)?

X Yes

☐ No

The OMB Circular establishes general policy for information governance, acquisitions, records management, open data, workforce, security, and privacy. As the SAORM, I promote records management as a mission critical function to ensure IRS records are available where and when they are needed, to whom they are needed, for as long as they are needed. Records management initiatives I oversee include the following FY 2017 activities:

Information Governance

- Adherence to strategic framework (eRecords Road Map, Strategic Approach, eRecords Implementation Plan) composed of standards, processes, roles and metrics that hold the agency and employees accountable to create, organize, secure, maintain, use, and dispose of information in ways that align with M-12-18, The Federal Records Act, and The Presidential Memorandum

Policy Updates

- Pending RIM Policy Handbook updates, including IRM 1.15.3 (*Disposing of Records*) relating to records loss reporting, and IRM 1.15.6 (*Managing Electronic Records)* relating to unstructured data management/preservation guidance
- Closed policy gap for reporting to RIM and NARA incidents of records loss/data and equipment; created Form 15035, *Records Loss Reporting*
- NARA approved Capstone Form 1005 (Job No. GRS 6.1-0058-2017-0001, signed September 25, 2017) to update the IRS email retention schedule
- Issued Interim Guidance relating to Organizational Mailbox Management
- Received final approval for all RIM staff to be on the new 0308 RM job series by September 30, 2017, to be compliant with M-12-18 requiring one records management occupation series across all federal agencies

Inter-agency Engagement and Coordination

- Continue to partner with IT to meet OMB *Managing Government Records* directive (M-12-18), including in-house upgrades to the agency's Microsoft Exchange and SharePoint (unstructured data) environments; supports email management updates, allows for greater network-backed records storage, and more automated records retention and destruction controls in Exchange
- Participate in twice weekly information shares with CIO/Technology Implementation Services Office, CIO/Enterprise Services, and CIO/Strategy & Planning-PMO (including demos, review of documents owned by either PGLD or CIO, or the facilitation of discussions between other stakeholders like PGLD/CIO vendors)
- Partnered with SharePoint PMO and Mitre to assist in preliminary unstructured data organizational scan
- Partnered with IT integrated project team (IPT) SEC implementation team and created a SOP to establish/formalize roles and responsibilities for employees who began serving as IT SEC Coordinators
- Provide regular contributions to BSP informational updates regarding eRecords SharePoint Training and Implementation

- Continue to engage with IRS business units to review/update records inventories and files plans to identify current recordkeeping requirements, including the identification of permanent records (and format)

Communications/Outreach

- Published multiple on-line articles and communications relating to email (including organizational email management), Exchange Upgrade (and PST ingestion), and SEC
- Updates to list of over 4,000 local BU Information Resource Coordinators (IRCs) for every IRS post of duty (POD) and closely monitored by RIM staff
- Conducted records inventory and file plans initiatives to help identify current BU recordkeeping requirements, including the identification of permanent records (and format)
- RIM Records Specialist Team outreach and briefings to staff Service-wide: serviced over 45,000 IRS employees via fielded calls, email and training session (this effort is on-going)

Training/Professional Development

- Participated in HCO meetings to brief business unit HCO administrators and SEC coordinators; conducted briefings at two all-manager training sessions
- Conducted 41 Outlook 2016 email demo training sessions
- RIM Records Specialist staff transitioned to new 0308 job series

8. What policies, guidance or support do you need from NARA to ensure a successful transition to fully electronic recordkeeping? (NARA Strategic Plan. Goal 2.4)

IRS seeks continued close NARA partnership/support/engagement to promote on-going enhancements to its electronic recordkeeping systems; compliant with Federal records management requirements and NARA regulations.