



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: **Kirit Amin**

Position title: **Chief Information Officer**

Address: **500 E Street SW, Suite 412 Washington, DC 20436**

Office telephone number: **202-205-3065**

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

Please list them below:

U.S. International Trade Commission

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*

Response:

- 1. Started discussions with Office of the Chief Information Officer (OCIO) and General Counsel (GC) staff for implementation of the Capstone approach**
- 2. Discussion with OCIO staff included technical and general requirements needed to implement Capstone, as well as identifying the best option for implementation**

3. Discussion with General Counsel staff included identification of Capstone officials and guidance for the retention of email records for both Capstone officials and non-Capstone officials
4. Discussed agency plan to implement Capstone approach with the agency's NARA Appraisal Archivist

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

Response:

1. Continue discussion with OCIO and GC staff.
2. Begin discussions with FOIA and Privacy officers.
3. Draft policy and procedures in implementing the Capstone approach
4. Communicate information regarding the Capstone approach to agency staff.
5. Provide training to agency staff (current as well as newcomers).

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.

Response:

Commission personnel only use official accounts for email. The agency does not use text, chat or IM.

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).

Response:

All email messages are archived into Enterprise Vault every 6 months. Disposition of email messages is not authorized. The agency will be implementing the Capstone approach to manage its email messages; this is expected to be complete by the end of CY 2016.

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.*

Response:

- 1. Agency unscheduled records identified when drafting file plans for the various offices and meeting with staff.**
- 2. Records disposition schedules were drafted for each office to cover unscheduled records to create guidance for the retention and disposition of records (media-neutral).**
- 3. Draft records disposition schedules are being reviewed by specific offices; once completed, GC will then review. After GC reviews, draft records disposition schedules will be submitted to NARA for appraisal and subsequent approval by the Archivist of the United States.**

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

Response:

- 1. Complete internal review process.**
- 2. Submit draft records disposition schedules to NARA for appraisal before the end of FY 2016.**
- 3. Implement schedules after approval by NARA.**
- 4. Communicate to staff by providing training on the use of the revised records disposition schedules after approval by NARA.**

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.*

Response:

- 1. Identified current records disposition schedule items that do not provide guidance on the disposition and retention of electronic records; these items are revised in the draft records disposition schedules to include electronic versions.**
- 2. Revised current agency directive on records management to include guidance on electronic records management.**

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

Response:

- 1. Implement records disposition schedules when approved by NARA.**
- 2. Provide training to agency staff on creation, maintenance, and disposition of electronic records.**

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.

Response:

The agency is moving towards implementation of the Capstone approach to manage its email records. It is on pace to complete this project to meet the deadline of December 31, 2016 as

mandated by the Managing Government Records Directive. At the same time, the agency is completing its review of draft records disposition schedules that cover both paper versions and electronic versions of records. Draft records schedules will be submitted to NARA by the end of fiscal year 2016 to meet the deadline of December 31, 2016.

The agency's Records Officer took a different route in the inventory of records process. Instead of handing each individual a form to fill out, the Records Officer drafted a file plan for each office in the agency and discussed the file plan with the office Records Liaison, the Office Director, and staff members. This allowed an open discussion on what specific records each office creates and maintains. It also allowed the Records Officer to identify any unscheduled records in the office. The office meetings also served as a quasi-training class: offices identified their records based on their business and also identified non-record materials they maintain as well as documentary materials that contain Controlled Unclassified Information. The Records Officer then provided guidance to offices on the retention and disposition of their records, non-record materials, and personal papers.

Being a small agency, the challenges and obstacles encountered by the Records Officer were minimal and were usually about meeting schedules. A primary question heard throughout the agency is how do we deal with email? This will be discussed with each office in detail when the Capstone approach is implemented agency-wide. Training will also be provided to agency staff on email management.

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.*

Response:

Not applicable; Senior Commission officials do not change with the 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.*

Response:

Not applicable. See response to 8a.