

Department of the Treasury - Financial Crimes Enforcement Network - report received 4/6/2017

Federal Email Management Reporting for 2016

NARA is requiring Federal agencies to report on their email management in accordance with the jointly issued OMB/NARA *Managing Government Records Directive (M-12-18)*, which states:

Federal agencies will manage both permanent and temporary email records in an accessible electronic format by December 31, 2016.

The reporting period began on January 9, 2017, and reports are due back to NARA no later than March 17, 2017.

In April 2016, NARA released the *Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18)*, which synthesizes email records management requirements from the Federal Records Act, Code of Federal Regulations, and existing NARA guidance. In this document, NARA defines successful email management as having policies and systems in place to ensure that email records can be used, accessed, and have the appropriate disposition applied. The success criteria also describes the policy, system, access, and disposition requirements needed to properly manage all temporary and permanent email in electronic format. Also, NARA has been working with Federal agencies, Congress, and other parties to update existing statutory, regulatory, and NARA guidance requirements for managing email.

In the interest of transparency in Government and to promote collaboration and communication among agencies, NARA will post a PDF version of your responses on the NARA website unless otherwise prohibited.

NARA reserves the right to follow up with agencies to obtain additional information and/or documentation that supports their answers to the questions.

The following questions are designed to indicate how well your agency's email management meets the four areas of compliance enumerated in the *Criteria for Managing Email Records*: policies, systems, access, and disposition.

Please read carefully and choose the description that best describes your agency's ability to manage email.

Policies: Agency-wide policies and training must inform account holders of their responsibilities for managing email records. Policies should be developed with all relevant stakeholders and should address the requirements of the Federal Records Act, 36 CFR Chapter XII Subchapter B, and NARA guidance.

Q1.

Which of these levels best describes the state of your email policies?

- No email policies; relevant stakeholders have not been identified; senior level email is not managed in any way; and there are no policies related to loss of email records.
- Email policies are being drafted; there is general awareness of the roles and responsibilities; and awareness of the threat of loss of email records.
- Email policies address general use of email only; relevant stakeholders, including the CIO, Records Managers, and General Counsel, have been identified; roles and responsibilities for email management have been defined; and there is an awareness of the threat of loss of email records.
- Email policies have been developed and disseminated; stakeholders including the CIO, Records Managers,

and General Counsel are involved in making policy and other decisions regarding email; there are policies governing holds on email records or accounts; and there are policies and procedures protecting against loss of email records.

- Email policies are in place and implemented throughout the agency; all staff (including senior staff) have been trained on their roles and responsibilities for managing email; policies include use of personal or non-official email accounts; records management staff and/or Inspector General perform periodic audits of email policies to ensure proper use and implementation; and annual mandatory RIM and Information Security training includes roles and responsibilities regarding email.

Points = 3

C1. Comments on Q1 (Optional)

Email policies for access, preservation, and protection are in place at FinCEN. "Email as records" policy has been circulated, re-drafted, and recirculated within FinCEN management since May of 2016.

Systems: Agencies must have systems in place that can produce, manage, and preserve email records in an acceptable electronic format until disposition can be executed. Additionally, systems must support the implementation of agency policies and provide access to email records throughout their lifecycle.

Q2.

Which of these levels best describes the state of your email systems?

- Email is managed in disparate systems; email is managed by the end user; and no retention applied.
- Systems retain temporary email records up to 180 days only; and print and file is main method of preservation for email.
- Some centralized administration of email systems; limited identification of permanent email; and email is manually managed by the end user based on retention schedules.
- Administration of email systems is specifically assigned; temporary and permanent email categories identified; system under development to handle implementation of agency policies and lifecycle management; and electronic retention is the main method for the preservation of email.
- Email systems manage and preserve email in electronic format; limited end user input needed to apply proper retention, access, and disposition policies; permanent email identified and managed; email systems maintain the content, context, and structure of the records; and email records are associated with their creator.

Points = 2

C2. Comments on Q2 (Optional)

Email is centrally-managed limited identification of permanent email; and email is manually managed by the end user based on retention schedules.

Access: Email records must remain usable and retrievable throughout their lifecycle. Access supports an agency's ability to carry out its business functions. Access should address internal agency needs and accommodate responses to requests for information.

Q3.

Which of these levels best describes the usability and retrievability of email throughout their lifecycle?

- There is no attempt to determine whether or not email can be accessed beyond immediate business needs; there is no management of email of departed employees; producing email for requests is difficult, costly, and

not always feasible; agency has multiple email systems that do not relate to each other and are not searchable across multiple accounts or systems; little or no safeguards in place for unauthorized access, unintentional modification, or destruction; no defined processes for maintaining records making access and retrieval difficult; processes are performed in an ad hoc manner; and no formal definition or classification of email records.

- Email records are retrievable through system back-ups or other means; there is minimal management of email of departed employees; producing email for requests is achievable but time consuming and costly; limited training or other awareness of security of email; and processes for maintaining email records are starting to be standardized agency-wide.
- Email records are included in a draft retention schedule pending approval; email of departing employees is maintained until someone can review; formal processes exist in order for records to be accessed and retrieved in a timely manner; standardized RIM lifecycle processes have been developed across the agency making access and retrieval of email records more reliable; and standardized processes for access and retrieval are beginning to be promulgated across the agency.
- Email is retrievable during normal course of business; the email system has procedures for providing reference and responses for email requests; security and privacy protocols are included in the system; processes for the identification and classification of email records are standardized across the agency, making access and retrieval reliable; and records are usually accessed and retrieved in a timely manner.
- Email is fully retrievable for requests; email review, preservation, and disposition is embedded into the processes for departing employees; records management controls are built into the email system to prevent unauthorized access, modification, or destruction; processes for the identification and classification of email records are documented and integrated with agency business and mission at the strategic level.

Points = 1

C3. Comments on Q3 (Optional)

Currently, Records Training is available to all staff while and privacy and information security trainings are mandatory. 2017 policy will include mandatory training at all levels of E-mail records account holders. Policy and procedures are drafted in collaboration with the Technology Division to appropriately preserve and protect email as records.

Disposition: The agency must have a NARA-approved schedule in place to be able to carry out the disposition of permanent and temporary email records – using either agency-specific schedules or General Records Schedule (GRS) 6.1: Email Managed Under a Capstone Approach.

Q4.

Which of these levels best describes the state of your disposition of email?

- There is no retention schedule specifically covering email; disposition of email is not being done; and permanent email records have not been identified.
- Beginning to work with NARA to create retention schedule specifically covering email; disposition of email is handled haphazardly by the end user; and there is some identification of permanent and temporary email records
- Retention schedule covering email in draft but not approved; and disposition of email is handled with limited training for the end user.
- Retention schedule covering email is approved by NARA; end users are trained to oversee the disposition of email records; and permanent records are identified and maintained until transfer to NARA.
- Retention schedule covering email has been approved by NARA; retention schedules are built into email management systems; permanent records are identified and captured by email management systems; and

permanent records can be or have been successfully transferred to NARA.

Points = 3

C4. Comments on Q4 (Optional)

FinCEN uses NARA's GRS for its retention schedule. There has been limited training resources available for the end user to this point. However, 2017 policy will include mandatory training at all levels of email records account holders.

Q5. Please enter your contact information below.

First Name:	<input type="text" value="E. Gayle"/>
Last Name:	<input type="text" value="Rucker"/>
Job Title:	<input type="text" value="RMO"/>
Agency:	<input type="text" value="Treasury"/>
Component Agency/Office/Bureau:	<input type="text" value="Financial Crimes Enforcement Network (FinCEN)"/>
Email Address:	<input type="text" value="edna.rucker@fincen.gov"/>

SCORING

NARA will be using the maturity model score in our analysis of the success Federal agencies have had in developing email management programs and what work needs to continue to improve email management across the government.

- For each question, answer options are scored zero to four points.
- Total number of scored questions in this report is four.
- Total number of points is 16.
- Maximum maturity model score (also known as the weighted mean) is four.
- The maturity model score is derived by dividing your total number of points based on the level description chosen by the number of scored questions.

Your Total Points = 9

Your Maturity Model Score = 2.25

Score of 0 to 1.9 = High Risk - of not managing email effectively

Score of 2 to 2.9 = Moderate Risk - of not managing email effectively

Score of 3 to 4 = Low Risk - of not managing email effectively