

National Credit Union Administration - received 4/15/2019

Federal Email Management Reporting for 2018

The jointly issued OMB/NARA *Managing Government Records Directive (M-12-18)* required Federal agencies to manage both permanent and temporary email records in an accessible electronic format by December 31, 2016.

NARA is continuing to monitor the management of email by requiring Federal agencies to report annually on the implementation of the *Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18)*. The success criteria describes the policy, system, access, and disposition requirements needed to properly manage all temporary and permanent email in an electronic format.

The reporting period begins on March 11, 2019, and reports are due back to NARA no later than April 19, 2019.

NARA plans to post your responses on archives.gov upon receipt. Please ensure that your agency's report is a publicly releasable version. This action is in the interest of transparency in Government and to promote collaboration and communication among agencies. NARA intends to list any non-responding agencies in a summary report and on the website.

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 *Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18)*.

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 exist; relevant stakeholders have not been identified; senior-level email is not managed in any way; and there are no policies related to the loss of email records.
- Email policies are being drafted; and there is a general awareness of both the roles and responsibilities for managing email records, and of the risk of loss of email records.
- Email policies address general use of email only; relevant stakeholders have been identified; roles and responsibilities for email management have been defined; and there is an awareness of the risk of loss of email records.
- Email policies have been developed and disseminated; stakeholders, including the Chief Information Officer, 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; policies include use of personal or non-official email accounts; and there are policies and procedures protecting against the 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 including 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 records and information management (RIM) and information security training includes roles and responsibilities regarding email.

Points = 3

CI. Comments on Q1 (Optional)

National Credit Union Administration (NCUA) email policies cover legal holds and use of personal/non-official email accounts. In addition, in January 2018, the NCUA approved and issued a Records Management Program Instruction (agency-wide policy) that applies to records in all formats, including email. The Office of the Chief Information Officer and the Office of General Counsel (OGC), including the records management program, which is part of the Information and Access Law Division in OGC, are involved in policy and other decisions regarding email.

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 is applied.
- Systems retain temporary email records up to 180 days only; and print and file is the main method of preservation for email.
- Some centralized administration of email systems exists; there is 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 are identified; systems are under development to handle the 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 is needed to apply proper retention and disposition policies; permanent email is identified and managed; email systems maintain the content, context, and structure of the records; and email records are associated with their creator.

Points = 4

C2. Comments on Q2 (Optional)

NARA approved the NCUA's implementation of Capstone in 2016. The NCUA manages email records under its approved Capstone records schedule.

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 your email throughout its 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; there are little or no safeguards in place for unauthorized access, unintentional modification or destruction; no defined processes exist for maintaining records making access and retrieval difficult; processes are performed in an ad hoc manner; and there is 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; there is limited training or other awareness of the 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 the 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 are 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 = 2

C3. Comments on Q3 (Optional)

In 2020, the NCUA plans to implement a FedRamp cloud-based Email as a Service (EaaS) solution that includes substantial records management and e-discovery capabilities.

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.
- Agency is 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 is in draft form but not yet approved; and disposition of email is handled with limited training for the end user.
- Retention schedule covering email has been 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)

Q5. Please enter your contact information below.

First Name:	<input type="text" value="Jeffrey"/>
Last Name:	<input type="text" value="Nakrin"/>
Job Title:	<input type="text" value="Attorney Advisor"/>
Agency:	<input type="text" value="National Credit Union Administration"/>
Component Agency/Office/Bureau:	<input type="text"/>
Email Address:	<input type="text" value="jnakrin@ncua.gov"/>

SCORING

NARA is using a maturity model score in our analysis of the success Federal agencies have had in developing email management programs and of what work needs to continue to improve email management across the government. NARA and Federal agencies will be able to compare maturity model scores from 2016 and 2017 with those reported for 2018.

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 score is derived by dividing the total number of points based on the level description chosen by the number of scored questions.

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

Your Total Points = 12

Your Maturity Model Score = 3