

U.S. Nuclear Regulatory Commission

Information and Records Management Program

Plans and Activities

Fiscal Years 2014-2019

Office of Information Services

IT/IM Portfolio Management and Planning Division

IT/IM Policy Branch

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Enclosure

OVERVIEW

The purpose of the Information and Records Management (IRM) program is to provide complete and accurate agency information by developing policies, procedures, guidance, and tools for the capture, use, storage, and disposition of information to allow staff and the public to access U.S. Nuclear Regulatory Commission (NRC) information repositories, now and in the future. This vision is embedded in the NRC's Information Technology/Information Management (IT/IM) Strategic Plan for Fiscal Years (FYs) 2012–2016¹, as follows:

Goal 1: Effective Information Access—NRC staff and stakeholders can quickly and easily access the information they need.

Strategy 5: Improve the completeness and accuracy of NRC records and information.

Key Activities:

- Modernize the IRM processes to make information capture and categorization more complete and transparent.
- Develop new file plans, records categorization, and retention schedules for use in records capture.
- Improve the staff's knowledge of IRM related to NRC work products.
- Incorporate IRM policies into the NRC's capital planning and investment control process and in the agency's IT project management methodology.

The purpose of this document is to provide the vision, objectives, and plans for modernizing the IRM program. This plan will strengthen the NRC's IRM program through a series of projects that, over the next several years, will enable the NRC to better manage its information whether through investments, enterprise architecture, or ownership of IRM projects outside of traditional roles and responsibilities. This plan shows the culmination of assessments, reports, and project plans, all of which provided a direction for modernizing the program to support the NRC's future information management goals, especially those linked to the transition to electronic government and more efficient work processes. This plan contains a compliant program, including resource estimates required to implement and sustain an agencywide IRM program.

This plan also includes projects that are aligned with the strategic goals for the Office of Information Services (OIS), specifically supporting "Improve the Usability of NRC Information" and the following strategies:

- Improve information delivery capability
- Improve search capability and access to information
- Facilitate data capture
- Improve data quality

¹ OIS is currently updating the IT/IM Strategic Plan for FYs 2014 – 2018.

IDENTIFICATION OF PROJECTS

The diagram below depicts the individual projects that comprise the IRM program. These projects are already underway or proposed to be initiated as key activities linked to the IT/IM Strategic Plan, Goal 1: Effective Information Access.



The scope of the IRM program is to provide an integrated approach to managing the various information and records initiatives that, when taken together, comprise a holistic IRM program. What follows is a high-level description of each of the 12 projects, including objectives, tasks, dependencies, projected timeline, resources, and impacts if not funded. The remaining three sections present a diagram of the project interdependencies, a chart of the complete resource requirements and a section that identifies the most critical projects.

KEY PROJECTS AND CRITICAL RESOURCE NEEDS

1. Policy and Procedures Updates

Division Lead: OIS Portfolio Management and Planning Division (PMPD)

Primary NRC Partners: Office of the General Counsel (OGC)

Objective: Develop IRM policies and procedures that incorporate statutory and regulatory information and records management requirements. IRM policies embody a comprehensive, consistent, and cost-effective approach to managing information assets that rests on a shared vision of IRM and its role at the NRC. IRM policies, guidance, and procedures will be updated to allow the transformation of the way the NRC conducts business and use technology to become more efficient.

Tasks:

- a. Revise Management Directive (MD) 3.53, "NRC Records and Document Management Program." The revision will establish practical and implementable policies that are consistent with the use of new technologies and government initiatives such as Open Government and the Presidential Memorandum M-12-18, "Managing Government Records Directive" (Presidential Directive, M-12-18). The revision will also eliminate MD 3.56, "Micrographics Management."
- b. Incorporate IRM policy and procedures in manuals, desk procedures, Web guidance, or similar issuances.
- c. Create job aids to add to the IRM Toolkit as new policies, procedures, and technologies warrant.
- d. Develop and conduct an annual assessment survey for offices to complete to assist in responding to the National Archives and Records Administration (NARA's) annual Records Management Self-Assessment, once policies are updated.
- e. Redesign internal and external Web sites to reflect updated policies.

Dependencies: NARA guidance updates.

Targeted Completion: Dependent on resources allocated.

Resources Needed: See resource table.

Impact if Not Funded: Noncompliance with Presidential Directive M-12-18 and Title 36 of the *Code of Federal Regulations* (36 CFR), Subchapter B, "Records Management." Requirements for electronic information and systems will not be realized and systems will continue to remain outdated and noncompliant.

2. Vital Business Information (VBI)

Division Lead: OIS/PMPD

Primary NRC Partners: Office of Nuclear Security Incident Response (NSIR), OIS Solutions Development Division (SDD), OIS Operations Division (OD)

Objective: Develop an ongoing VBI program that supports the Continuity of Operations (COOP) program, as required by the Federal Emergency Management Agency, to ensure that vital agency records are protected and efficiently recoverable or salvageable in an emergency and will be sufficient to resume agency operations during and after a disaster.

Tasks:

- a. Conduct periodic quality assurance checks on VBI inventories. For example, do not allow an office response to cite “ADAMS” (Agencywide Documents Access and Management System) as its VBI or state “none.”
- b. Digitize VBI, if appropriate, and add to ADAMS.
- c. Develop mitigation strategy for VBI that cannot reside in ADAMS or be in electronic format.
- d. Create work processes in ADAMS Records Manager (RM) to automatically notify the owner to update VBI. This activity will include objects stored inside or outside of ADAMS.

Dependencies: NRC COOP plans, ADAMS RM development, digitization.

Targeted Completion: Dependent on resources allocated.

Resources Needed: See resource table.

Impact if Not Funded: Inability to access or recreate VBI in the event of a COOP exercise or during an actual COOP event. Noncompliance with Federal Continuity Directive, Executive Order 12656 and mandates under 36 CFR 1236.20, “What Are Appropriate Recordkeeping Systems for Electronic Records?”

3. Records Retention Revisions

Division Lead: OIS/PMPD

Primary NRC Partners: Program Offices, OGC, OIS Customer Service Division (CSD)

Objective: Establish records retention schedules that are understandable and implementable in an electronic environment. NUREG-0910, “NRC Comprehensive Records Disposition Schedule,” was last updated in 2005. This NUREG is arranged by individual offices and was developed to support paper record processes. It contains over 800 items and is cumbersome. In addition, the schedules are based on the media on which the information exists; whereas, NARA approved media-neutral schedules in 2007. NUREG-0910 will be updated to be organized by lines of business (LOB)² instead of individual offices. Record retentions will be based on a newer retention structure (buckets) of transitory, short term, intermediate, long term, and extended long term records. The updated NUREG will allow sorting by retention, disposition, office, and LOB.

Tasks:

- a. Ensure accurate file plans exist for all NRC offices, to include assignment of all records to a LOB.
- b. Sort record series and systems by LOB to establish acceptable retention buckets.
- c. Draft record retention schedules and obtain internal concurrence from program offices and OGC.

² NARA terminology for what NRC calls “business lines.”

- d. Submit proposed retention schedules to NARA for approval.
- e. Update NUREG-0910, "NRC's Comprehensive Records Disposition Schedule" when approved by NARA.
- f. Regularly validate records retention schedules.

Dependencies: File taxonomy, internal concurrence from program offices and OGC, NARA approval.

Targeted Completion: End of FY 2016.

Resources Needed: See resource table.

Impact if Not Funded: Noncompliance with 36 CFR Subchapter B, "Records Management," and Presidential Directive M-12-18, "Managing Government Records." Implementing record retention schedules in electronic record repositories will be cumbersome. An inability to show enterprise control of agency information management or provide evidence of such for Congress, courts, or other disclosure-related activities could jeopardize the agency's reputation and lead to sanctions being imposed.

4. Digitization

Division Lead: OIS/OD

Primary NRC Partners: Program Offices, OIS/PMPD, OIS/CSD, OIS/SDD

Objective: Institute processes and procedures to continuously reduce the amount of paper-based information and reliance on microfiche. Legacy information will be easily accessible to staff and stakeholders for decision making. Also, this effort will support Government-wide initiatives such as openness, transparency, and managing government information electronically.

Tasks:

- a. Implement the Digitization Plan, which states that OIS will routinely digitize paper when small amounts of records are requested from storage and will work with offices on budget and processes when larger volumes (more than 10 boxes) are requested.
- b. Develop ADAMS library for operator license records. Digitize active records and implement day-forward digitization processes in 2014 to support the operator licensing tracking system and reactor program system modernization. If deemed necessary, plan for retrofit of terminated records.
- c. Prioritize list of permanent records that will be digitized to meet the intention of Presidential Directive M-12-18. Synchronize the list with program priorities for license renewal and other emerging digitization needs which will provide a solution for easier access to records, while also meeting the mandate. Develop and implement procedures for completion.
- d. Develop policy and processes for the use and eventual elimination of microfiche to include 1) quality assurance that eligible records are in ADAMS or were destroyed or transferred based on retention schedules, and 2) disposition of non-record materials, which may be moved to another repository if appropriate.

Dependencies: Program office participation in prioritizing permanent records.

Targeted Completion: End of calendar year (CY) 2019 in accordance with Presidential Directive M-12-18.

Resources Needed: See resource table.

Impact if Not Funded: Inability to access all VBI during COOP. Inability for some staff to “work from anywhere” if legacy paper records are in offsite storage. Lack of enterprise control when rogue workarounds are developed by office staff members who cannot get legacy information into electronic format. Noncompliance with Federal mandates and initiatives, such as Presidential Directive M-12-18.

5. File Taxonomy

Division Leads: OIS/CSD

Primary NRC Partners: Program Offices, OIS/PMPD, OIS/SDD

Objective: Develop a structured and consistent way to describe and organize information, similar to how the NRC uses LOB for organizing budget information and activity codes for describing staff work hours. File taxonomy is a way to categorize information and records by LOB that serves as a framework to structure the agency’s content for use throughout the life cycle (creation, collaboration, security, access, publishing and storage, retrieval, and disposition). The file taxonomy will be embedded as high-level folders within ADAMS and other repositories of agency information. In addition, related topics will be assigned to cross LOBs. The subject topics will allow staff to identify content to suit their functional needs at a lower level, while still maintaining a structure that allows records to be accessible now and in the future.

Tasks:

- a. Draft file taxonomy and subject topics for licensing LOB.
- b. Communicate with agency staff to review and incorporate changes.
- c. Finalize file taxonomy and subject topics for licensing LOB.
- d. Integrate the file taxonomy into business and recordkeeping processes (e.g., ADAMS, SharePoint, and shared drives) so that information is automatically captured and tagged accurately and seamlessly.
 - i. Establish folder structure in ADAMS.
 - ii. Submit subject file codes to ADAMS Change Review Board to be inserted as optional profile element.
 - iii. Develop standard ADAMS profiling and templates based on file taxonomy to be used for auto-categorization.
 - iv. Develop same for other repositories.
- e. Create file taxonomy and subject topics for the rest of the LOBs.

Dependencies: Management and staff support and collaboration.

Targeted Completion: End of FY 2015.

Resources Needed: See resource table.

Impact if Not Funded: Noncompliance with Federal recordkeeping regulations to institute procedures for organizing records. Inability to show enterprise control of agency information or provide evidence of such for Congress, courts, or other disclosure-related activities.

6. ADAMS Records Manager

Division Co-Leads: OIS/PMPD and OIS/SDD

Primary NRC Partners: Program Offices, OIS/CSD, OIS/SDD, OIS/OD

Objective: Deploy technology for the sound, practical capture and management of electronic data to support business processes, litigation searches and holds, preservation of information, and compliance with Federal laws. Of immediate and critical need is the ability to embed records retention schedules and VBI rules in ADAMS. For clarification, “declaring an Official Agency Record” in ADAMS is an NRC term for creating a PDF document that cannot be changed and may be published. This process falls short of good recordkeeping practices and compliance. However, the NRC owns an application that has the capability to attach necessary recordkeeping metadata to a document with little or no human intervention and appropriately “declare” and maintain it as a record. Likewise, the tools to support workflow processes can be developed to support updates to VBI as well as notification of record retention and disposition and record litigation holds.

Tasks:

- a. Develop records retention and VBI rules in ADAMS in incremental phases based on LOB retention schedule development, file taxonomy, and emerging program needs.
- b. Define roles and responsibilities and train assigned staff.
- c. Refine filing of records into ADAMS to include embedding file taxonomy and records topic profiling.
- d. Review ADAMS profiling rules and templates for potential to standardize profiles for auto-categorization.
- e. Establish a method to retrofit records already existing in ADAMS.
- f. Establish procedures for how to handle superseded records, living documents, and packages more efficiently.
- g. Develop a long term solution for the management of agency information that is aligned with Federal initiatives such as open and machine readable efforts, cloud computing, and open source opportunities.

Dependencies: Revision of Records Retention Schedules; File Taxonomy; NARA updates.

Targeted Completion: FY 2017.

Resources Needed: See resource table.

Impact if Not Funded: Noncompliance with Federal recordkeeping requirements and Presidential Directive, M-12-18. Inability to apply retention and disposition records, including transferring permanent records to NARA or deleting obsolete data, which creates risks related to finding accurate information in a timely manner for routine business or disclosure (Freedom of Information Act (FOIA), eDiscovery, Congress) related requests.

7. E-mail Capture and Management

Division Lead: OIS/PMPD

Primary NRC Partners: Office of the Secretary, Program Offices, OIS/SDD, OIS/CSD

Objective: E-mail capture and management approaches will be developed based on a three-pronged strategy as recognized by industry and NARA best practices. One approach will be to use technology to automate the capture and filing of e-mail messages based on predetermined business rules. The second approach will be to automatically delete e-mail that has not been filed by the user. The third approach will be to have e-mail of permanent value, such as that of high-level officials (Office Director and above) captured and categorized as such when created, referred to by NARA as “Capstone.”

Tasks:

- a. Propose new policy on archiving e-mails; reduce it to 180 days, which is a recognized practice in other Federal agencies.
- b. Identify e-mail accounts or functions for potential automatic capture as permanent records.
- c. Develop a solution to establish Capstone e-mail accounts and automatically capture and preserve permanent e-mail records.
- d. Analyze potential expansion of the current e-mail capture tool (initially used for hearing files) as a solution for supporting the three-pronged approach.

Dependencies: Agreement by OIS and OGC, budget for technology and support, NARA updates to include Capstone e-mail guidance.

Targeted Completion: End of CY 2016, in accordance with Presidential Directive M-12-18.

Resources Needed: See resource table.

Impact if Not Funded: Noncompliance with Federal recordkeeping requirements and Presidential Directive M-12-18. Undue burden on staff to file e-mail messages. Permanent e-mail records of high informational value will not be transferred to NARA when eligible. Continued growth of obsolete and trivial (transitory) e-mail.

8. RIMCert

Division Lead: OIS/PMPD

Primary NRC Partners: OIS/SDD

Objective: Systems that create or maintain structured or unstructured data will have life cycle RM capabilities if the data falls under the definition of a Federal record. The required

RM compliance requirements will be incorporated, via manual or automated processes, during the development phases of the NRC systems that generate and contain Federal records. Compliance with RM requirements must be built in early rather than added later, during the NRC system development. In addition to compliance, life cycle management will reduce data storage costs by applying deletion rules to unneeded, outdated information.

Tasks:

- a. Determine policy changes to “Integrated IT Management Framework,” MD 2.X, if any, necessary to implement this process. MD 2.X will be the replacement for current MD 2.8, “Project Management Methodology (PMM).”
- b. Integrate RM requirements into relevant project artifacts, procedures, checklists, and related materials as necessary for records compliance within MD 2.X.
- c. Develop auditing checkpoints and assessment procedures within the Integrated IT Management Framework to determine if RM policies and requirements are being followed.
- d. Align policies and procedures in MD 2.X with those in MD 3.53 to ensure recordkeeping requirements are addressed early in a project. Includes close collaboration (input and review) of MD 3.53 updates and MD 2.X content development.

Dependencies: Inclusion of this process in MD 2.X, “Integrated IT Management Framework.”

Targeted Completion: End of FY 2015.

Resources Needed: See resource table.

Impact if Not Funded: Inability to apply mandated records retention schedules and noncompliance with Federal recordkeeping requirements. Continued growth in volume of obsolete electronic data.

9. Litigation Preparedness

Division Lead: OIS/PMPD

Primary NRC Partners: OGC, OIS/SDD

Objective: Establish prescribed procedures to respond to litigation notices, track responses, implement record holds, and document the effort. Discovery and litigation preparedness will be addressed by coordinating with OGC to incorporate best practices in industry and those recommended by the U.S. Department of Justice.

Tasks:

- a. Complete Business Process Improvement analysis for information dissemination, or use previously developed materials documenting the collection and dissemination process.
- b. Establish a Discovery and Disclosure Task Force comprised of OGC and OIS staff to develop clear and agreed-upon policies and procedures for responding to litigation notices and record holds.

- c. Evaluate technical solutions, including analyzing costs and benefits of deploying the eDiscovery Management and Analyzer Tool.
- d. Establish an information blueprint to include a hardware inventory of desktops, laptops, shared drives, file shares, etc., as well as a software inventory to determine formats and data object types to assist with locating data and devices in the event of litigation. This blueprint must be kept up-to-date.
- e. Develop communications plan and training for staff.

Dependencies: OGC support.

Targeted Completion: End of FY 2014.

FY 2014 Resources: See resource table.

Resources Needed: See resource table.

Impact if Not Funded: Inability to provide a consistent and repeatable method for responding to FOIA, eDiscovery, and disclosure requests. Continued manual efforts and redundancies.

10. Training and Outreach

Division Lead: OIS/PMPD

Primary NRC Partners: OIS/CSD, Office of the Chief Human Capital Officer (OCHCO)

Objective: Develop and conduct appropriate and mandatory training for all agency employees about recordkeeping responsibilities.

Tasks:

- a. Develop mandatory online IRM training.
- b. Seek opportunities for outreach and training through other vehicles such as FOIA training and new hire orientation.
- c. Work with Nuclear Information and Records Management Association to develop a plan for ongoing support and activities, such as E-Submittal Guidance, standardizing metadata and document profiling, as well as retention standards.

Dependencies: None.

Targeted Completion: CY 2014, in accordance with Presidential Directive M-12-18.

Resources Needed: See resource table.

Impact if Not Funded: Noncompliance with Presidential Directive M-12-18.

11. Controlled Unclassified Information (CUI)

Division Lead: OIS/PMPD

Primary NRC Partners: Program Offices, NSIR, OCG, OCHCO

Objective: Transition from SUNSI to CUI as required by Executive Order 13556. NARA estimates publication of the final policy in March/April 2015.

Tasks:

- a. Establish a schedule for phased implementation of the following key elements of the CUI program: Policy and Guidance: Revise MD 3.4, "Release of Information to the Public," and MD 12.6, "NRC Sensitive Unclassified Information Security Program" (both of which are due for revision in December 2015).
 - i. Training: Create a new CUI training module and revise current security training.
 - ii. Technology: Identify, assess, and modify IT systems based on NIST guidelines and OMB issuances (e.g., encryption of data).
 - iii. Accountability: Self-inspect CUI program implementation and report to NARA on progress.
- b. Update applicable Web sites.

Dependencies: Finalization of NARA CUI policy (March/April 2015); NSIR, OGC, and OCHCO support.

Targeted Completion: FY 2019, depending on issuance date of Final Rule.

Resources Needed: See resource table.

Impact if Not Funded: Noncompliance with Executive Order 13556.

12. Authoritative Data

Division Lead: OIS/SDD

Primary NRC Partners: Program Offices, OIS/PMPD

Objective: Eliminate the need to produce and maintain duplicative data, which will simplify data interfaces between systems, reduce operational costs, and effectively maintain data quality.

Tasks:

- a. Identify initial set of common AD across the enterprise and their rightful owners.
- b. Implement NRC Enterprise Data Inventory to maintain and expand common AD definitions.
- c. Identify incremental requirements to enable and streamline management of common AD system interfaces. The first incremental set of requirements will focus on the Replacement Reactor Program System (R-RPS) in FY 2014.
- d. Implement R-RPS AD interfaces using standard approaches in FY 2015.
- e. Identify best enterprise solution to enable and streamline management of common AD interfaces beginning FY 2016.

Dependencies: Approval from NARA on retention of AD and policy development.

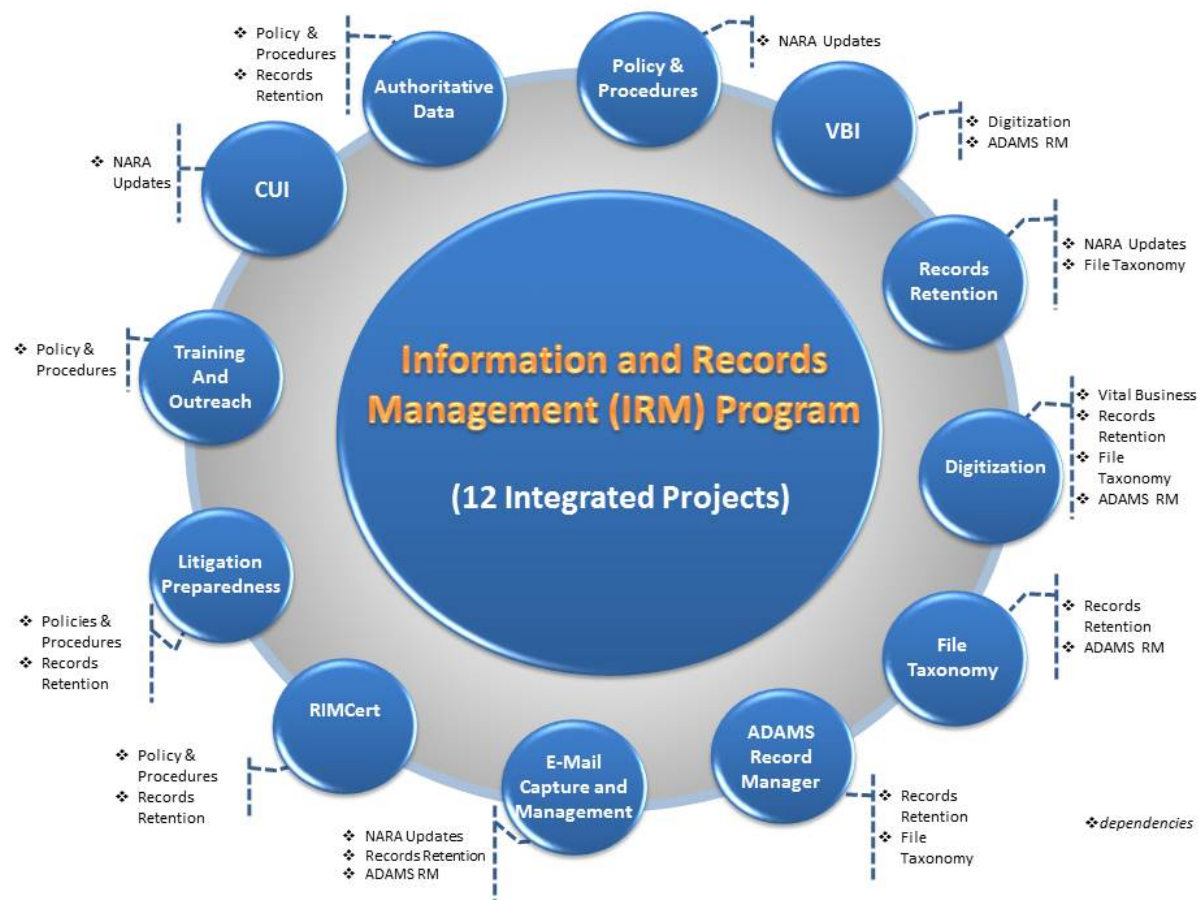
Targeted Completion: First enterprise AD interface management solution to be completed in FY 2017.

Resources Needed: See resource table.

Impact if Not Funded: Ineffective use of resources to maintain system interfaces and quality of their underlying data. Inability to apply mandated retentions to appropriate data. Inability to complete the initial R-RPS implementation by FY 2016.

PROJECT INTERDEPENDENCIES

The following diagram depicts project interdependencies in which meeting milestones within one project are critical for the success of another. The chart also shows where the completion of an NRC project also relies on the publication of NARA updates and guidance.



SUMMARY OF RESOURCES NEEDED

The following table represents the resources needed to develop a robust agency IRM program.

		FY14			FY 15			FY16			FY17		FY18		FY19	
		Enacted		Shortfall Received	Current Est		Unfunded	Request		Unfunded	Requirements		Requirements		Requirements	
Index	Project	\$ K	FTE	\$ K	\$ K	FTE	\$ K	\$ K	FTE	\$ K	\$ K	FTE	\$ K	FTE	\$ K	FTE
1	Policy and Procedures Update	200	1			1.5	200		1.5	200		1		1		1
2	Vital Business Information ¹		0.5			0.5			0.5			0.5		0.5		0.5
3	Records Retention Revisions ²		1	77		1			1			1		1		1
4	Digitization		0.5		1000	0.5		50	0.5	950	1000	0.5	1000	0.5	1000	0.5
5	File Taxonomy	55	0.5		3	0.5		3	0.5		3	0.5	3	0.5	3	0.5
6	ADAMS Records Manager		0.5	750		1	1000		1	1000	1000	1		1		1
7	Email Capture and Management			1900	1500	1		1500	1	0		1		1		1
8	Records Information Management Cert		0.5			0.5										
9	Litigation Preparedness		0.5			0.5	350		0.5			0.5		0.5		0.5
10	Training and Outreach	45	0.5													
11	Controlled Unclassified Information		1		100	1		100	1	300	100	1	100	1	100	1
12	Authoritative Data ³		0	500		0	1200			1200	1200		1200		1200	
	Total	300	6.5	3227	2603	8	2750	1653	7.5	3650	3303	7	2303	7	2303	7

¹ FY15, FY16, and FY17 contract work is consolidated within ADAMS Records Manager project resources

² FY15 and FY16 contract work is consolidated within the Policy and Procedures update project resources

³ FY 2015 and FY 2016 resources to be requested during shortfall process.

NOTE: During the PBPM process, resources may be shifted, as appropriate.

PRIORITY FOCUS

A significant contribution to the success of the IRM program is sufficient and consistent funding to effectively execute the planned activities. Budgetary constraints will require IT/IM programs to be prioritized to maximize the benefits to the agency mission. The most critical of the 12 IRM projects are prioritized to align with Presidential Directive M-12-18, which establishes timelines required by agencies to meet the goal of electronic recordkeeping to ensure transparency, efficiency, and accountability.

In the diagram below, the priority projects from this plan are identified, and when they and other integrated projects must be accomplished in order to meet the Presidential Directive M-12-18 deadlines.

PRESIDENTIAL DIRECTIVE TIMELINE and IRM PROJECTS

