

From: [RMSA Team](#)
To: [Armentrout, Deborah](#)
Subject: [External_Sender] Records Management Self-Assessment 2015
Date: Wednesday, January 27, 2016 3:05:21 PM

Thank you for completing the 2015 Records Management Self-Assessment! You will find in this email your agency's response as well as a URL that will direct you to your agency's response where you can download a PDF and print. If you have any questions about the self-assessment, please send an email to rmsselfassessment@nara.gov.

Recipient Data:

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[SID=SV_1HsFce0VMjHylOB&R=R_55OgKIBGswOfCSh](https://archives.qualtrics.com/CP/Report.php?SID=SV_1HsFce0VMjHylOB&R=R_55OgKIBGswOfCSh)

Response Summary:

Is there a person in your agency who is responsible for coordinating and overseeing the implementation of the records management program? (36 CFR 1220.34(a))

Yes

Please provide the person's name, position title, and office.

Deborah Armentrout, Agency Records Officer, Office of the Chief Information Officer

Does your agency have a records management directive(s)? (36 CFR 1220.34(c))

Yes

When was your agency's directive(s) last reviewed and/or revised to ensure it includes all new records management policy issuances and guidance?

FY 2015 - present

Has your agency updated its records management directives and/or policies to reflect changes to the Federal Records Act (Public Law 113-187)?

Under development

Has your agency's records management program established strategic goals and objectives?

Yes

Does the leadership and management of your agency recognize records and information management as a priority?

Yes

Does your agency have a network of designated employees within each program and administrative area who are assigned records management responsibilities? These individuals are often called Records Liaison Officers (RLOs) though their titles may vary. (36 CFR

1220.34(d))

Yes

Does your agency have internal records management training*, based on agency policies and directives, for employees assigned records management responsibilities? (36 CFR 1220.34(f))

*Includes NARA's records management training workshops that were customized specifically for your agency or use of the Federal Records Officer Network (FRON) RM 101 course.

Yes

Has your agency developed internal, staff-wide, formal training*, based on agency policies and directives, which helps agency employees and contractors fulfill their recordkeeping responsibilities? (36 CFR 1220.34(f)) *Includes NARA's records management training workshops that were customized specifically for your agency or use of the Federal Records Officer Network (FRON) RM 101 course.

Yes

Has your agency developed internal, staff-wide, formal training*, based on agency policies and directives, on the retention and management of records created and maintained in electronic formats? (36 CFR 1220.34(f)) *Includes NARA's records management training workshops that were customized specifically for your agency.

Yes

Has your agency developed internal, staff-wide, formal training*, based on agency policies and directives, on the retention and management of records created through electronic communications including email, text messages, chat, or other messaging platforms or apps, such as social media or mobile device applications? (36 CFR 1220.34(f)) *Includes NARA's records management training workshops that were customized specifically for your agency.

Not applicable, please explain -- Our formal training covers retention and management of email. We do not retain or manage other electronic communications.

Does your agency require that all senior and appointed officials, including those incoming and newly promoted, receive training on the importance of appropriately managing records under their immediate control? (36 CFR 1220.34(f))

Yes

Is the records management training described in questions 9 through 13 mandatory?

Yes

Which staff members are required to complete the records management training described in questions 9 through 13? (Choose all that apply)

Agency employees

Contractors

Senior officials

Employees assigned records management responsibilities

Is records management training included in the new hire in-processing for new employees in your agency?

Yes

In addition to your agency's established records management policies and records schedules,

has your agency's records management program developed and implemented internal controls to ensure that all eligible, permanent agency records in all media are transferred to NARA according to approved records schedules? (36 CFR 1222.26(e)) ** These controls must be internal to your agency. Reliance on information from external agencies (for example, NARA's Federal Records Centers) or other organizations should not be considered when responding to this question.

Yes

Please select the control activities your agency performs to ensure that all eligible permanent records in all media are transferred to NARA. (Choose all that apply)

- Regular briefings and other meetings with records creators
- Approval process for transfer notices from Federal Records Centers
- Monitoring and testing of file plans
- Regular review of records inventories
- Internal tracking database of permanent record authorities and dates

In addition to your agency's established policies and records schedules, has your agency developed and implemented internal controls to ensure that Federal records are not destroyed before the end of their retention period? (36 CFR 1222.26(e)) <?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" /> ** These controls must be internal to your agency. Reliance on information from external agencies (for example, NARA's Federal Records Centers) or other organizations should not be considered when responding to this question.

Yes

Please select the control activities your agency performs to ensure that Federal records are not destroyed before the end of their retention period. (Choose all that apply)

- Regular review of records inventories
- Approval process for disposal notices from off-site storage
- Monitoring and testing of file plans
- Notification from facilities staff when large trash bins or removal of boxes are requested
- Annual records clean out activities sponsored and monitored by records management staff

Does your records management staff have oversight over records created at the highest levels of your agency (i.e. those of Agency Heads and appropriate advisors, and executive support staff) in order to ensure they are created, maintained, captured, preserved, and, when applicable, properly transferred to NARA? (36 CFR 1220)

Yes

Does your agency evaluate, by conducting inspections/audits/reviews, its records management program to ensure that it is efficient, effective, and compliant with all applicable records management laws and regulations? ** For this question, your agency's records management program, or a major component of the program (e.g., vital records identification and management, the records disposition process, records management training, or the management of your agency's electronic records) must be the primary focus of the inspection/audit/review.

Yes

How often is your records management program, or a major component of your program, evaluated for compliance with agency records management policies and procedures? <?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

Every 3 - 4 years

Was a written report prepared as part of the most recent inspection/audit/review?

Yes

Do your agency's evaluation procedures include creating plans of corrective action that are monitored for implementation?

Yes

Has your agency established performance goals for its records management program?

Yes

Please describe your agency's records management program's performance goals.

The Records management program supports the agency's Information Technology/Information Management Strategic Plan: Fiscal Years 2016 – 2020 (NUREG-1908, Volume 3), IT/IM Strategic Plan Goal 2: Enhance instruction and guidance to users for accessing information.

There are individual project plans and milestones in the Information and Records Management (IRM) Program Plan overseen by the Agency Records Officer which support this goal.

Strategy 1 - Enhance methods for the capture, usage, storage, and disposition of information

Strategy 2 - Enhance instruction and guidance to users for accessing information

Strategy 3 - Enhance openness and transparency of information by improving electronic record-keeping (OMB M-12-18)

Example - digitizing and electronically managing all permanent paper records by 2019

Strategy 4 - Enhance methods for users to acquire information

Has your agency's records management program identified performance measures for records management activities such as training, records scheduling, permanent records transfers, etc.?

Yes

Which of these input measures do you collect to monitor your records management program's performance? (Choose all that apply)

Percentage of records scheduled

Percentage of staff trained in records management

Development of new records management training modules

Audits of internal systems

Does your agency's records management program have documented and approved policies and procedures that instruct staff on how your agency's permanent records in all formats must be managed and stored? (36 CFR 1222.34(e))

Yes

Has your agency identified the vital records of all its program and administrative areas? (36 CFR 1223.16)

Yes

How often does your agency review and update its vital records inventory? (36 CFR 1223.14)

Annually

Is your vital records plan part of the Continuity of Operations (COOP) plan?

Yes

When was the last time your agency submitted a records schedule to the National Archives?

FY 2010 -- 2012

Has your agency ever submitted a records schedule for approval using the Electronic Records Archives (ERA)?

Yes

Does your agency disseminate every approved disposition authority (including newly approved records schedules and General Records Schedule items) to agency staff within six months of approval? (36 CFR 1226.12(a))

Yes

Did your agency transfer permanent non-electronic records to NARA during FY 2015? (36 CFR 1235.12)

Other, please explain -- On October 10, 2014, NRC requested a freeze on the transfer of all non-electronic NRC records to allow time for correction of the schedules in NARA's tracking systems. Therefore no non-electronic records were transferred during FY2015.

Did your agency transfer permanent electronic records to NARA during FY 2015? (36 CFR 1235.12)

No - No electronic records/systems were eligible for transfer during FY 2015

Does your agency have a method for estimating the volume in bytes of permanent electronic records currently being maintained by your agency?

No

When will these permanent electronic records be eligible for transfer to NARA? (Choose all that apply)

FY 2016

After FY 2020

Does your agency track when its permanent records (regardless of format) are due to be transferred to NARA?

Yes

What methods does your agency use to track its permanent records? (Choose all that apply)

Rely on Federal Records Center notifications

Maintain an inventory

Database or other automated tracking

Does your agency store inactive temporary and/or permanent records in a commercial records storage facility?

No

Does your agency store inactive temporary and/or permanent records in an agency records center? (Note: This does NOT include agency staging areas and temporary holding areas.)

No

Does your agency store inactive temporary and/or permanent records in an agency records staging or holding area?

Yes

Does the staging or holding area(s) comply with the standards prescribed by 36 CFR 1234*?

*It is not required but encouraged that staging or holding areas comply with 36 CFR 1234.

Yes

Does your agency provide exit briefings for senior officials on the appropriate disposition of the records, including email, under their immediate control? (36 CFR 1230.10(a & b))

Yes

Who is involved in the exit briefings? (Choose all that apply)

Other, please explain -- The briefings are run by the NRC Historian, an Office of the Secretary administrative specialist (correspondence analyst), and the senior level advisor to the Secretary of the Commission.

Are the exit briefings documented for purposes of accountability?

No

Upon separation, are senior officials required to obtain approval from records management program staff or other designated official(s) before removing personal papers and copies of records?

Yes

Has your agency incorporated and/or integrated internal controls to ensure the reliability, authenticity, integrity, and usability of agency electronic records maintained in electronic information systems? (36 CFR 1236.10)

Yes

Does your agency have documented and approved procedures to enable the migration of records and associated metadata to new storage media or formats so that records are retrievable and usable as long as needed to conduct agency business and to meet NARA-approved dispositions? (36 CFR 1236.20(b)(6))

Yes

Are records management staff involved in developing procedures to ensure that records are properly migrated from retired systems?

Yes

Does your agency maintain an inventory of electronic information systems that indicates whether or not each system is covered by an approved NARA disposition authority? (36 CFR 1236.26(a))

Yes

Does your agency ensure that records management functionality, including the capture, retrieval, and retention of records according to agency business needs and NARA-approved records schedules, is incorporated into the design, development, and implementation of its electronic information systems? (36 CFR 1236.12)

Yes

Does your agency's records management program staff participate in the design, development, and implementation of new electronic information systems?

Yes

Which of these activities does your agency's records management program staff participate in to ensure that records requirements are part of the recommended solution? (Choose all that apply)

Participate in review and acceptance of proposals for new systems

Participate as stakeholder in requirements gathering

Participate as stakeholder in design phase

Participate as stakeholder in development phase including testing the system

Provide sign off authority for the implementation of new systems

Monitor system for adherence to standards, policies, and procedures

Does your agency have documented and approved policies and procedures in place to handle email records that have a retention period longer than 180 days? (36 CFR 1236.22)

Yes

Does your agency have documented and approved policies and procedures to implement the guidelines for the transfer of permanent email records to NARA described in NARA 2014-04: Appendix A, Revised Format Guidance for the Transfer of Permanent Electronic Records – Tables of File Formats Section 9 - Email (<http://www.archives.gov/records-mgmt/policy/transfer-guidance-tables.html>)?

Yes

Do employees in your agency have more than one agency-administered email account? (NARA Bulletin 2013.02)

Yes

Does your agency have documented and approved policies that address these types of accounts and that state that email records must be preserved in an appropriate agency recordkeeping system? (36 CFR 1236.22(b))

Yes

Does your agency allow the use of personal email accounts to conduct official business? (36 CFR 1236.22(b))

Yes

Does your agency have documented and approved policies that address the use of personal email accounts that state that all emails created and received by such accounts must be preserved in an appropriate agency recordkeeping system and that a complete copy of all email records created and received by users of these accounts must be forwarded to an official electronic messaging account of the officer or employee no later than 20 days after the original creation or transmission of the record? (36 CFR 1236.22(b) and P.L. 113-187)

Yes

Does your agency's email system(s) retain the intelligent full names on directories or distribution lists to ensure identification of the sender and addressee(s) for those email messages that are Federal records? (36 CFR 1236.22(a)(3))

No

What method(s) does your agency employ to capture and manage email records? (Choose all that apply)

Print and file

Captured and stored in an electronic records management system

Does your agency audit staff compliance with the agency's email preservation policies?

No

How often does your agency audit staff compliance with the agency's email preservation policies?

Not applicable, agency does not audit staff compliance

Does your agency plan to adopt the "Capstone" approach to managing email records as specified in NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records?

Yes

Have you submitted a retention schedule for identifying "Capstone" accounts for approval by NARA?

No, please explain -- Proposed retention schedule is currently being developed.

Does your agency have documented and approved policies and procedures in place to manage electronic messages including: text messages, chat/instant messages, voice messages, and messages created in social media tools or applications?

Yes

Does your agency have an approved records schedule covering electronic messages including: text messages, chat/instant messages, voice messages, and messages created in social media tools or applications that meet the definition of a Federal record?

No

Does your agency create and maintain any of the following types of metadata for electronic records? (Choose all that apply)

Descriptive metadata

Structural metadata

Administrative metadata

Rights management metadata

Preservation metadata

Does your agency maintain metadata for permanent records in a records management or other application?

Yes

Does your agency maintain metadata for permanent records sufficient to understand, maintain and provide access to the records?

Other, please explain -- The NRC makes every attempt to maintain metadata for permanent records in accordance with NARA 2014-04 Appendix A, Revised Format Guidance for the Transfer of Permanent Electronic Records. At the same time, particularly because our some processes operate under a "pen and paper" environment with hand-written notes that are integral to the business process, the full array of metadata possible for electronic records is not

easily or efficiently captured. The NRC has also worked closely with NARA to adapt additional technologies to meet NARA's requirements. In April 2015, the NRC had analysis completed on email to PDF conversions where NARA's Electronic Records Division described the NRC's test as "a relatively good implementation of email as PDF," but added that the test still raised areas of concern. The NRC will continue to work with NARA to pioneer new solutions and to use NARA's currently-recommended solutions wherever practicable.

Does your agency have an SAO for Records Management? (If you are a component of a Department, you may answer yes, even if this is not being done at the component level.)
Yes

Does your agency records officer meet regularly (four or more times a year) with the SAO for Records Management to discuss the agency records management program goals?
Yes

Is your agency actively working with NARA appraisal staff to schedule all unscheduled paper and other non-electronic records by December 31, 2016?
Not applicable, all paper and other non-electronic records have been scheduled

Does your agency have a method of continually identifying new and unscheduled records?
Yes

What methods does your agency use to identify new and unscheduled records?
Conduct routine information inventories, participate in privacy impact assessments and solution development lifecycle processes.

Has your agency identified any additional unscheduled records that have not already been reported to NARA?
No

Does your agency use cloud services?
Yes

For what purpose(s) is your agency using cloud services? (Choose all that apply)
Other, please explain -- The agency uses a recently implemented private cloud. The cloud hosts a variety of systems and services in support of administrative activities. No data is resident on the external cloud services.

Are recordkeeping requirements included?
Yes

Will your agency use the new Records and Information Management Series, 0308, (job series) released by the Office of Personnel Management in 2015?
Yes

In 2015, NARA and the Federal Records Council introduced the Federal RIM Program Maturity Model (<http://www.archives.gov/records-mgmt/prmd.html>). Are you familiar with this or other maturity models?
Yes

Are you using the Federal RIM Program Maturity Model or other maturity models to measure the maturity of the records management program?

Yes

Does your agency use your RMSA scores to measure the effectiveness of the records management program?

Yes

How many full-time equivalents (FTE) are in your agency/organization? (Choose one)

1,000 – 9,999 FTEs

What other staff, offices, or program areas did you consult when you completed this self-assessment? (Choose all that apply)

Senior Agency Official

Office of the General Counsel

Information Technology staff

Records Liaison Officers or similar

How much time did it take you to gather the information to complete this self-assessment?

More than 3 hours but less than 6 hours

Did your agency's senior management review and concur with your responses to the 2015 Records Management Self-Assessment?

Yes

Please provide your contact information.

Name: Deborah Armentrout

Agency, Bureau, or Office: Nuclear Regulatory Commission

Job Title: Agency Records Officer

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Phone Number: 301-415-7228

Are you the Agency Records Officer?<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

Yes

Do you have any suggestions on improving the Records Management Self-Assessment next year?

no

Embedded Data

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