

Janney, Margie

From: NARA's RM Oversight and Reporting Program <noreply@qemailserver.com>
Sent: Tuesday, April 14, 2020 5:44 PM
To: Janney, Margie
Subject: [External_Sender] 2019 Records Management Self-Assessment

Thank you for completing the 2019 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:

Time Finished: 2020-04-14 17:44:04 EDT

IP: 148.184.174.61

ResponseID: R_3rSRbfNeDA7NJ6p

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Response Summary:

Q1. 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

Q2. Please provide the person's name, position title, and office.

Margie Janney, CRM/NS/FED

Agency Records Officer and Chief, Information Management Services Branch

Office of the Chief Information Officer

Q3. Does your agency have a Senior Agency Official for Records Management (SAORM)? (For components of a department this is most likely at the department level, and you may answer "Yes," even if this is not being done at the component level.)

Yes

Q4. Does your Agency Records Officer meet regularly (four or more times a year) with the SAORM to discuss the agency records management program's goals? (For components of a department, this is most likely at the department level.)

Yes

Q5. 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

Q6. Does your agency have a documented and approved records management directive(s)? (36 CFR 1220.34(c))

Yes

Q7. 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 2019 - present

Q8. 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 an agency-customized version of the Federal Records Officer Network (FRON) RM 101 course.

Yes

Q9. Has your agency developed mandatory internal, staff-wide, formal training*, based on agency policy and directives, covering records in all formats, including electronic communications such as email, text messages, chat, or other messaging platforms or apps, such as social media or mobile device applications, 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 an agency-customized version of the Federal Records Officer Network (FRON) RM 101 course. **Components of departmental agencies may answer "Yes" if this is handled by the department. Department Records Officers may answer "Yes" if this is handled at the component level.

Yes

Q10. 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

Q12. 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 (e.g., NARA's Federal Records Centers) or other organizations should not be considered when responding to this question. *Examples of records management internal controls include but are not limited to: ● Regular briefings and other meetings with records creators ● Monitoring and testing of file plans ● Regular review of records inventories ● Internal tracking database of permanent record authorities and dates

Yes

Q13. 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)) **These controls must be internal to your agency. Reliance on information from external agencies (e.g., NARA's Federal Records Centers) or other organizations should not be considered when responding to this question. *Examples of records management internal controls include but are not limited to: ● Regular review of records inventories ● Approval process for disposal notices from off-site storage ● Require certificates of destruction ● Monitoring shredding services ● Performance testing for email ● Monitoring and testing of file plans ● Pre-authorization from records management program before records are destroyed ● Ad hoc monitoring of trash and recycle bins ● 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

Yes

Q14. In addition to your agency's records management policies and records schedules, has your agency developed and implemented internal controls to ensure that all permanent records are created/captured, classified, filed and managed according to their NARA-approved records schedules? (36 CFR 1220.34(i))

Yes

Q15. 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? (36 CFR 1220.34(j)) **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, evaluations are conducted by the Office of Inspector General

Q16. How often does your agency conduct formal evaluations of a major component of your agency (i.e., programs or offices)?

Once every 3 years

Q17. Was a formal report written and subsequent plans of corrective action created and monitored for implementation as part of the most recent inspection/audit/review? (Choose all that apply)

Yes, formal report was written

Yes, plans of corrective action were created

Yes, plans of corrective action were monitored for implementation

Q18. Has your agency established performance goals for its records management program? *Examples of performance goals include but are not limited to: ● Identifying and scheduling all paper and non-electronic records by the end of DATE ● Developing computer-based records management training modules by the end of DATE ● Planning and piloting an electronic records management solution for email by the end of DATE ● Updating records management policies by the end of the year ● Conducting records management evaluations of at least one program area each quarter

Yes

Q19. Has your agency's records management program identified performance measures for records management activities such as training, records scheduling, permanent records transfers, etc.? *Examples of performance measures include but are not limited to: ● Percentage of agency employees that receive records management training in a year ● A reduction in the volume of inactive records stored in office space ● Percentage of eligible permanent records transferred to NARA in a year ● Percentage of records scheduled ● Percentage of offices evaluated/inspected for records management compliance ● Percentage of email management auto-classification rates ● Development of new records management training modules ● Audits of internal systems ● Annual updates of file plans ● Performance testing for email applications to ensure records are captured ● Percentage of records successfully retrieved by Agency FOIA Officer in response to FOIA requests

Yes

Q20. 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

Q21. Has your agency identified the vital records of all its program and administrative areas? (36 CFR 1223.16) *Components of departmental agencies may answer "Yes" if this is handled by the department.

Yes

Q22. How often does your agency review and update its vital records inventory? (36 CFR 1223.14)

Ad hoc

Q23. Is your vital records plan part of the Continuity of Operations (COOP) plan?

Yes

Q24. As the Agency Records Officer (or records management staff), have you received FOIA training?

Yes, I have received formal FOIA training (online or in-person instructor-led session)

Q25. Who reviews responses to FOIA requests? (Choose all that apply)

FOIA Officer
Office of General Counsel
Program office where the records originated

Q26. How does your agency handle duplicate records when processing FOIA requests?

Agency manually de-duplicates search results

Q27. Which of the following does your agency/component have available on its FOIA website for requesting records? (Choose all that apply)

Guide to accessing agency information

Q28. At your agency/component, who ensures that records posted to the FOIA Reading Room are accessible to people with disabilities (per 508 compliance)? (Choose all that apply) Note: Section 508 of the Rehabilitation Act of 1973 requires all Federal departments and agencies to ensure that their electronic information and technology are accessible to people with disabilities. (29 U.S.C. 794d(a)(1)(A))

IT Office/Web manager

Q30. When was the last time your agency submitted a records schedule to NARA for approval? (36 CFR 1225.10)

FY 2018 - 2019

Q31. Does your agency periodically review agency-specific records schedules to ensure they still meet business needs, to identify gaps that may indicate unscheduled records, or to make needed revisions? Note: An agency-specific records schedule means it covers items that are not covered by the General Records Schedules (GRS).

Yes

Q32. Does your agency have agency-specific records schedules currently in use that include items approved before January 1, 1990?

Yes

Q33. Are you currently reviewing agency-specific records schedules with items approved before January 1, 1990, for updating and/or rescheduling? (CFR 1225.22)

Yes, this is in progress

Q34. Are records and information in your agency managed throughout the lifecycle [creation/capture, classification, maintenance, retention, and disposition] by being properly identified, classified using a taxonomy, inventoried, and scheduled? (36 CFR 1222.34, 36 CFR 1224.10, and 36 CFR 1225.12)

To some extent

Q35. Are records and information in your agency easily retrievable and accessible when needed for agency business? (36 CFR 1220.32(c))

Most records can be retrieved and accessed in a timely manner

Q36. 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

Q37. Did your agency transfer permanent non-electronic records to NARA during FY 2019? (36 CFR 1235.12)

Yes

Q38. Did your agency transfer permanent electronic records to NARA during FY 2019? (36 CFR 1235.12)

No

Q39. Does your agency track when permanent records are eligible for transfer to NARA?

Yes

Q40. Please explain your response to the previous question. (If you answered "Yes," please be specific on methods used. If you answered "No," please explain why not.)

The current Records Management solution allows the agency to track dispositions for all permanent records, whether in paper or electronic format, and is used in conjunction with the NARA ERA transfer procedures for when they are eligible for transfer.

Q41. Does your agency conduct and document for accountability purposes training and/or other briefings as part of the on-boarding process for senior officials on their records management roles and responsibilities, including the appropriate disposition of records and the use of personal and unofficial email accounts? (36 CFR 1222.24(a)(6) and 36 CFR 1230.10(a & b))

Yes

Q42. Is the Agency Records Officer and/or Senior Agency Official for Records Management involved in on-boarding briefings or other processes for newly appointed senior officials?

Yes

Q43. Does your agency conduct and document for accountability purposes exit briefings for departing senior officials on the appropriate disposition of the records, including email, under their immediate control? (36 CFR 1222.24(a)(6) and 36 CFR 1230.10(a & b))

Yes

Q44. Is the Agency Records Officer and/or Senior Agency Official for Records Management involved in exit briefings or other exit clearance processes for departing senior officials?

Yes

Q45. Does the exit or separation process for departing senior officials include records management program staff or other designated official(s) reviewing and approving the removal of personal papers and copies of records by those senior officials? (36 CFR 1222.24(a)(6))

Yes

Q46. Does your agency store inactive temporary and/or permanent records in a commercial records storage facility?

No

Q48. Does your agency store inactive temporary and/or permanent records in an agency-operated records center? (Note: This does NOT include agency staging areas and temporary holding areas.)

No

Q52. Does your agency store inactive temporary and/or permanent records in an agency records staging or holding area?

Yes

Q53. Does the staging or holding area(s) comply with the standards prescribed by 36 CFR 1234.10, 36 CFR 1234.12, and 36 CFR 1234.14? * It is not required but encouraged that staging or holding areas comply with 36 CFR 1234.

Yes

Q55. 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

Q56. 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

Q57. 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

Q58. 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) *Components of departmental agencies may answer "Yes" if this is handled by the department.

Yes

Q59. Does your agency's records management program staff participate in the acquisition, design, development, and implementation of new electronic information systems?

To some extent

Q60. Which of the following best describes your agency's records management staff's participation in the procurement, acquisition, or other development of new electronic information software and systems, including but not limited to COTS purchases, database creation, and the software development lifecycle (regardless of methodology) to ensure appropriate records requirements are properly implemented? The records management staff:

Other engagement, please explain -- Records Management staff regularly participates in the CIO Evaluations, Enterprise Architecture (EA) strategic discussions, Intake Processes, as well as NRC Privacy Impact Assessment (PIA) and Privacy Threshold Assessment (PTAs) reviews. The CIO Evaluation process and the PIA/PTA records management questions are vital to assessing records management capabilities and staff are consulted during the Information Inventory reviews regarding any systems being implemented or updated. Although records management staff have awareness and input during these processes, stakeholder involvement is limited regarding some IT purchases and system lifecycle activities.

Q61. Does your agency have a process or strategy for managing permanent electronic records and related metadata in an electronic form?

Yes

Q62. Does your agency have documented and approved policies against unauthorized use, alteration, alienation or deletion of all electronic records?

Yes

Q63. Does your agency have a digitization strategy to reformat permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, and analog audio)?

Yes

Q64. Does your agency use cloud services for any of the following? (Choose all that apply)

Email

Communication tools other than email (calendars, messaging apps, etc.)

Administrative functions such as payroll, purchasing, and financial management

Mission/program-related functions

Case management

Office tools/software

Q65. Does your agency have documented and approved policies for cloud service use that includes recordkeeping requirements and handling of Federal records?

Yes

Q66. Does your agency have documented and approved policies and procedures in place to manage email records that have a retention period longer than 180 days? (36 CFR 1236.22)

Yes

Q67. 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 Bulletin 2014-04: Revised Format Guidance for the Transfer of Permanent Electronic Records – Appendix A: Tables of File Formats, Section 9 - Email? (36 CFR 1236.22(e))

Yes

Q68. Does your agency have documented and approved policies that address when employees have more than one agency-administered email account, whether or not allowed, that states that email records must be preserved in an appropriate agency recordkeeping system? (36 CFR 1236.22) *Examples of business needs may include but are not limited to: • Using separate accounts for public and internal correspondence • Creating accounts for a specific agency initiative which may have multiple users • Using separate accounts for classified information and unclassified information

Yes

Q69. Does your agency have documented and approved policies that address the use of personal email accounts, whether or not allowed, 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

Q70. 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))

Yes

Q71. What method(s) does your agency employ to capture and manage email records? (Choose all that apply)

Captured and stored in an email archiving system

Captured and stored in an electronic records management system

Q72. Which of the following describes the disposition authority for email records being used by your agency? (Choose all that apply)

GRS 6.1: Email Managed under a Capstone Approach; agency has an approved form NA-1005

Q73. Does the current NARA-approved form NA-1005 or agency-specific email schedule adequately reflect your existing organizational structure?

Yes

Q75. Does your agency track changes in Capstone accounts to ensure they are accurate and complete?

Yes

Q76. Please explain how your agency tracks changes to Capstone accounts. (Be specific)

As an integral part of our management of the Capstone program, the agency keeps track of all Executives who become "Capstone Officials" based on their role at the Agency. This mechanism allows us to identify individuals who have been, are currently, and are becoming Capstone Officials. Through the program we track accounts as they need to be created

for incoming Officials, we track active accounts for those in Capstone Official roles, and, subsequently, we close down accounts for outgoing Officials, keeping those records in our Agency's records management repository for later disposition to NARA.

Q77. Does your agency evaluate, monitor, or audit staff compliance with the agency's email preservation policies? (36 CFR 1220.18)

Yes

Q78. 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

Q79. How often does your agency evaluate, monitor, or audit staff compliance with the agency's policies for email preservation and the management of electronic messages including text messages, chat/instant messages, voice messages, and messages created in social media tools or applications?

Ad hoc

Q81. How many full-time equivalents (FTE) are in your agency/organization?

1,000 – 9,999 FTEs

Q82. 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

FOIA Officer

Information Technology staff

Records Liaison Officers or similar

Q83. How much time did it take you to gather the information to complete this self-assessment?

More than 6 hours but less than 10 hours

Q84. Did your agency's senior management review and concur with your responses to the 2019 Records Management Self-Assessment?

Yes

Q85. Please provide your contact information.

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Agency, Bureau, or Office: U.S. Nuclear Regulatory Commission

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Q86. Are you the Agency Records Officer?

Yes

Q88. Does your agency use your Records Management Self-Assessment scores to measure the effectiveness of the records management program?

Yes

Embedded Data

Q_URL https://archives.qualtrics.com/jfe/form/SV_efX6r5yZUrLwF4F?Q_DL=T8nfOK26DMxQw0I_efX6r5yZUrLwF4F_

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