



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

The Honorable David S. Ferriero
National Archives and Records Administration
Archivist of the United States
700 Pennsylvania Ave., NW
Washington, DC 20408-0001

Dear Mr. Ferriero:

In compliance with the Presidential Memorandum for Managing Government Records dated November 28, 2011, and as the Senior Agency Official responsible for the oversight and implementation of the Department's records management initiatives, I am submitting the Department of the Treasury response as outlined in Section 2(b)(i), 2(b)(ii), and 2(b)(iii) of the referenced memorandum.

The Office of Treasury Records worked closely with each of the Treasury's Bureaus to complete the attached consolidated response. The response outlines the Department's new electronic records initiatives; modernization efforts for records management policies, guidance, and training; and identifies challenges the Department incurs relative to provisions or omissions in regulatory guidance and policies. Key highlights and recommendations in the report include:

- Treasury's successful implementation of an Enterprise Content Management (ECM) electronic collaborative platform. The ECM platform is used to improve Treasury-wide business processes and incorporates records management into the Department's governance and electronic workflows;
- Identification of key gaps in current NARA guidance that pose obstacles for adoption of sound records management policies and practices including:
 1. updated guidance for social media/web technologies; and
 2. guidance to address permanent electronic records stored on obsolete media, software, and/or hardware.
- Mandatory inclusion of the Records Management Profile in the Federal Enterprise Architecture (FEA); and
- Collaboration of NARA, Chief Information Officers, Chief Technology Officers, with Records Managers to be fully engaged with all stages of the information life cycle, from information collection through use, protection, and disposition.

The Department appreciates the opportunity to participate in the Federal government-wide effort to reform records management and will be available to address inquiries at OfficeofTreasuryRecords@Treasury.gov.

Sincerely,

A handwritten signature in black ink that reads "Melissa Hartman". The signature is written in a cursive style with a long horizontal stroke at the end.

Melissa Hartman
Deputy Assistant Secretary
for Privacy, Transparency, and Records

Enclosure

**AGENCY RESPONSE TO PRESIDENTIAL MEMORANDUM - *MANAGING GOVERNMENT RECORDS*:
OPTIONAL TEMPLATE FOR NARRATIVE REPORTS**

Agency name: Department of the Treasury

Date: March 27, 2012

Name and email of individual submitting this response:

Evangela Wimbush-Jeffrey
evangela.wimbush-jeffrey@treasury.gov

Name of Senior Agency Official (may be the same individual): Melissa Hartman

Please enter your text after each section description. **When completed, send as an attachment to** RM.Communications@nara.gov.

For additional information, please refer to the [MEMORANDUM TO FEDERAL AGENCY HEADS: Presidential Memorandum on Managing Government Records](#), dated November 28, 2011 (transmitted under Memorandum to Federal Records Officers AC 03.2012).

Section 2(b)(1) Describe the agency's current plans for improving or maintaining its records management program, particularly with respect to managing electronic records. For each of the plans on your list, indicate which of the following priorities from sections 3(a)(1-6) is addressed and identify the top priority of your records management program and describe why it is your agency's top priority. **Enter agency 2(b)(1) response here [free form text field].**

Enterprise Content Management

Treasury programs are essential to the public. In addition, new laws and regulations present challenges to meet these growing requirements with existing resources. These forces are driving Treasury's effort to transform its processes, find new and innovative ways to minimize delays, while providing better and more efficient service. Implementation of the Enterprise Content Management (ECM) program is a top priority for Treasury, as it serves as the foundation for numerous projects to facilitate these efforts including e-Records Management capabilities. ECM is a Treasury-wide electronic collaborative platform used to improve business processes that incorporates records management into the Department's governance and electronic workflows.

[3(a)(i)](This refers to the specific section of the Presidential Memorandum on Managing Government Records)

ECM is both a strategy and a set of technologies designed to improve the management of unstructured information across the Department utilizing an online collaboration platform. ECM is a set of web-based tools that electronically capture, store, search/analyze, collaborate, share, and manage records. Successful deployment of the ECM platform has delivered significant tools and resources to facilitate effective records management such as e-Records Management and Digitization.

A key tenet of the ECM program has been to leverage existing Treasury investments where possible, add functionality where needed to support more efficient processes, move toward electronic versus paper workflows, and to provide more effective electronic service delivery to the public.

The ECM Program is a coordinated Treasury-wide effort between all Treasury bureaus to leverage governance and toolsets in the realm of information management. The ECM program office works in conjunction with the bureaus to find more efficient ways to identify and manage government records. Treasury has implemented multiple new business processes that have made great strides in records management. Treasury has utilized the ECM program to initiate and/or deploy the following efforts within the past year and will continue to refine these efforts in the coming year:

- Records Digitization
- Modernized Records Management & Privacy Policies
- Electronic Records Center
- DOD 5015.2 Certified Records Management Application
- Records Management Web Based Training Module
- Records and Information Management Month
- Electronic Records Management Training
- Enterprise Content Management (ECM)
 - Two-Way Trust
 - goFOIA Workflow
 - E-Discovery
 - Collaboration

Records Digitization

The Office of Treasury Records, in conjunction with the Treasury Printing & Graphics Division, partnered to offer high-quality digitization services to offices within the Department of Treasury. Digitization of legacy records is a cost-effective paper-to-electronic solution that minimizes records storage facility fees. Digital imaging also improves records maintenance and disposition, reduces FOIA response time, and allows instant access to millions of pages of records for e-Discovery searches. [3(a)(vi)]

Records Management Policy – Modernization

Treasury Directive 80.05, the Department's policy for records management, has been updated to address the use, retention, and disposition of social media and web 2.0 technologies and is currently pending approval. [3(a)(vi)]

Electronic Records Center

The ECM's Records Center feature provides Treasury's records management officers and liaisons the ability to manage records throughout the records life cycle—from creation to archival and deletion. Automated workflows and content organizer rules move the records through records life cycle up to final disposition. [3(a)(vi)]

Certified Records Management Application

In conjunction with the Electronic Records Center, Treasury also deployed a DOD 5015.2 Certified Records Management application. This application provides users with the ability to manage their information in accordance with applicable Federal and Treasury records management regulations and policies. The selected application meets all Federal standards and configured to include the General Records Schedule and Treasury's agency specific records series. [3(a)(v)]

Records Management Web Based Training

The Office of Treasury Records designed two web based records management training modules for Treasury employees and contractors. The course content was designed to educate employees and contractors on their records management responsibilities as it relates to Employees and Contractors and Senior Level Officials. [3(a)(ii)]

Records & Information Management Month

Over the past eight years, the Office of Privacy Transparency, & Records has sponsored the Department's Records and Information Management Month (RIMM). RIMM is an international event that has been celebrated recently by Federal agencies and foreign governments. RIMM is held during the month of April and this year will highlight the many aspects and challenges that impact records and information management.

Previous RIMM events were successful in providing education and awareness to Treasury and other Federal government employees. This year's event, entitled "Records Modernization: Reducing Our Carbon Footprint," was selected to continue to advance the electronic records management goals and objectives – to improve effectiveness and operational efficiency. The RIMM Open House–Panel Discussion will also highlight the objectives outlined in the Presidential Memorandum on Managing Government Records dated November 28, 2011. [3(a)(ii)]

Electronic Records Management Training

In preparation for the ECM deployment, the Office of Treasury Records sponsored Electronic Records Management training for Treasury Bureau Records Management Officers. The Records Management Officers received training on records classification schemes, metadata, security, retention, and disposal. These courses also included email capture and retention, wikis and blogs, and new best practices and standards. Additional course content covered records taxonomies, migration technologies for moving away from shared drives, and auto-categorization/auto-classification metadata extractions. [3(a)(ii)]

goFOIA Workflows

The ECM program office implemented a set of collaboration-based technologies known as goFOIA to provide a more efficient mechanism for responding to Freedom of Information Act (FOIA) requests submitted by the general public. These ECM tools refined the process by which Treasury receives, delegates, and responds to the public's requests for information. The tools were designed with scalable architectures to adequately manage growth and provide a robust

framework for extending features and capabilities to all Treasury bureaus and also include a feature for online submission of FOIA requests. [3(a)(iv)]

e-Discovery

It is Treasury's intent to leverage the ECM platform to keep up with increasing demands for the Department to identify, collect, process, review, analyze, and redact (as appropriate) discoverable records and information in response to litigation and FOIA requests as well as Congressional inquiries. This future tool will be maintained on the ECM platform and scalable to serve all of Treasury bureaus. [3(a)(v)]

Collaboration

Each program office has a collaboration space in which personnel can collaborate on documents and share information. The collaborative environment has the capacity for the use of blogs, wikis, and discussion forums. Treasury's collaboration tool features robust security mechanisms and permission management, allowing users to determine who exactly can view, edit, and delete information. It also provides integrated records management capabilities to ensure compliance with records management retention policies. [3(a)(vi)]

Compliance with Generally Accepted Recordkeeping (GARP) Maturity Model

Concurrent with implementing ECM, the Department's next priority is to ensure its records management program utilizes best practices. On March 29, 2011, the US Department of the Treasury, Office of Privacy, Transparency, and Records, began conducting Triennial Records Management Program Assessments for each Treasury bureau to obtain a gap analysis to create action plans for improvement. The assessment addressed requirements referenced in the National Archives and Records Administration (NARA) Annual Records Management Agency Self Assessments, Regulatory Compliance, the Department's Policy and Procedures, and the eight principles of the Generally Accepted Recordkeeping (GARP) Maturity Model.

To ensure compliance with Federal records regulations, the Office of Treasury Records conducted reviews of each bureau records management (RM) program, documented findings, and made recommendations to improve the effectiveness and efficiency in the respective programs. The Office of Treasury Records utilized the following assessment questions to compare to the GARP Maturity Model and determine the bureaus' level of compliance.

- Does the bureau currently utilize a DoD 5015.2 certified records management application (see page 6 for an explanation of this application)? If no, what process/interim solution was implemented to manage electronic records? Does it meet National Archives and Records Administration (NARA) metadata standards?
- Does the bureau utilize a document management application? Does it meet NARA metadata standards?
- Does the bureau utilize an email management application? If no, what process/interim solution was implemented to manage email records? Does it meet NARA metadata standards?

- What policies are in place to manage storage volumes for email containing records? Current storage volume? What are the associated annual costs?
- What policies are in place to manage storage volumes for email archives containing records? Current storage volume? What are the associated annual costs?
- What policies are in place to manage shared drives containing records? What is the current storage volume?
- What FOIA/e-discovery solutions are utilized by the bureau/office?
- What collaboration application does the bureau currently utilize?
- How frequently are vital records reviewed and updated?
- Does the facility in which records are stored meet NARA certification requirements?
- Has records retention policy been established for non-records in paper and electronic forms (including email)?
- What procedures are in place to ensure records are properly migrated from retired systems?
- Does the handbook/users guide provide guidance on records retentions schedules for social media? Does the handbook /users guide provide guidance on Web technologies?

During the assessment, the Office of Treasury Records staff documented bureau responses as “findings” and utilized this information in conjunction with the additional documentation requested to complete the assessment form. The results of the Bureau Records Management Program Assessment helped Treasury determine the level of completeness of each Bureau’s program, as well as understand what strengths and weaknesses exist and what assistance, training, or governance would best benefit the Bureaus and ensure a compliant Treasury-wide Records and Information Management (RIM) program. [3(a)(iii)]

Upon finalization, the Office of Treasury Records forwarded an electronic copy of the assessment results to the Records Management Officer (RMO) & Bureau Program Director for review. The assessment results contained the assessment findings, recommendations, and respective rankings. Using the findings as the baseline, the Office of Treasury Records made recommendations that aided the bureaus with aligning their performance objectives and strategic goals of Treasury’s ECM initiative which includes e-Records Management. Each of the bureau “Course of Action” plans were utilized to identify gaps between the bureau’s current practices and the GARP Maturity Model, to assess risks based on identified gaps, to determine whether additional information and/or analysis was necessary, develop priorities, and assign accountability for further program development based on the five levels identified by GARP:

- **Level 1 (Sub-Standard):** This level describes an environment where recordkeeping concerns are either not addressed at all, or are addressed in a very ad hoc manner. Organizations that identify primarily with these descriptions should be concerned that their programs will not meet legal or regulatory scrutiny.
- **Level 2 (In Development):** This level describes an environment where there is a developing recognition that recordkeeping has an impact on the organization, and that the organization may benefit from a more defined information governance program. However, in Level 2, the organization is still vulnerable to legal or regulatory scrutiny since practices are ill-defined and still largely ad hoc in nature.
- **Level 3 (Essential):** This level describes the essential or minimum requirements that must be addressed in order to meet the organization's legal and regulatory requirements. Level 3 is characterized by defined policies and procedures, and more specific decisions taken to improve recordkeeping. However, organizations that identify primarily with Level 3 descriptions may still be missing significant opportunities for streamlining business and controlling costs.
- **Level 4 (Proactive):** This level describes an organization that is initiating information governance program improvements throughout its business operations. Information governance issues and considerations are integrated into business decisions on a routine basis, and the organization easily meets its legal and regulatory requirements. Organizations that identify primarily with these descriptions should begin to consider the business benefits of information availability in transforming their organizations globally.
- **Level 5 (Transformational):** This level describes an organization that has integrated information governance into its overall corporate infrastructure and business processes to such an extent that compliance with the program requirements is routine. These organizations have recognized that effective information governance plays a critical role in cost containment, competitive advantage, and client service.

Treasury understands that managing records effectively and efficiently facilitates the completion of Treasury's work, preserves official agency records, and ensures access to Treasury information. It is the goal of the Office of Treasury Records to ensure adequate training and assistance is available to support the bureau RM programs in meeting compliance requirements as outlined in the assessment recommendations. As such, the Office of Treasury Records will review and report bureau progress toward the implementation of the assessment recommendations and planned course of actions beginning fiscal year 2012 and assess the Bureaus' performance every three years thereafter.

The Office of Treasury Records plans to issue quarterly data calls to monitor compliance, track completion of the Bureaus' respective action plans, and to document the status of the bureaus' accomplishments. Results of the data call have been incorporated into the Office of Treasury Records Bureau Assessment Dashboard for compliance monitoring and performance tracking. The data calls are instrumental in reporting program accomplishments in accordance with

estimated suspense dates derived from the November 28, 2011 Presidential Memorandum on Managing Government Records below.

Data Calls & Reporting Schedule

	Data Call Dissemination	Data Call Suspense Dates	Dashboard Updates	Draft of Consolidated Report to PTR Leadership for Review	Finalized Report to ASM for Review	External Reporting to NARA
1 st Quarter	December 21, 2011	January 31, 2012	February 29, 2012	March 7, 2012	March 14, 2012	March 27, 2012
2 nd Quarter	March 30, 2012	April 30, 2012	May 31, 2012	June 7, 2012	June 14, 2012	June 29, 2012
3 rd Quarter	June 30, 2012	July 30, 2012	August 31, 2012	September 7, 2012	September 14, 2012	September 27, 2012
4 th Quarter	September 30, 2012	October 30, 2012	November 28, 2012	December 5, 2012	December 12, 2012	December 26, 2012

**Dates are estimates based upon the Nov. 28, 2011 Presidential Memorandum – Managing Government Records*

Effective and efficient records management is Treasury’s gateway to information governance. In fulfilling the responsibilities to maintain a compliant, consistent, cost-effective, and efficient RIM program, Treasury has made it a priority to develop and implement an ECM governance framework to facilitate implementation of electronic recordkeeping requirements throughout the Department.

Section 2(b)(2) *Identify any provisions in relevant statutes, regulations, or official NARA guidance that currently pose an obstacle to the agency’s adoption of sound, cost-effective records management policies and practices. Describe the difficulty in as much detail as a 200-word limit (each) will allow. Please identify the statute/regulation/guidance as clearly as possible. Enter agency 2(b)(2) response here [free form text field].*

In response to the Presidential Memorandum on Managing Government Records, Treasury issued an internal data call to the Bureaus requesting the identification of any *provisions in relevant statutes, regulations, or official NARA guidance that currently pose an obstacle to the agency’s adoption of sound, cost-effective records management policies and practices*. As a result of this request, the Bureaus have indicated the following as obstacles to effective records management:

1. **Social Media/Web Technologies – Infinite Retention Periods.** The infinite retention periods of emails and communication logs of social media/web technologies publicly available on cloud based applications such as (Google Apps, Facebook, Twitter, etc.) have proven problematic with respect to a diligent e-discovery search for information that is relevant to the respective agency. These resources, although efficient and transparent, create difficulty in applying records retention policies to products not owned by the federal agency. A lack of consistency and regulatory governance within this industry increases agency costs associated with searches for electronic records and information to fulfill FOIA and litigation e-discovery requests as required by the Federal Rules of Civil Procedures on Electronically Stored Information.

The guidance recently released by the Federal CIO & Chief Acquisition Officers' Councils, "Creating Effective Cloud Computing Contracts for the Federal Government," is a step in the right direction to identify some of the records management issues with cloud computing. To be effective, this guidance should become mandatory.

2. **36 CFR Part 1228, Disposition of Federal Records, Section 1228.270 Electronic Records.** NARA guidance is clear on the procedures for transferring permanent electronic records to NARA facilities, but does not address permanent electronic records stored on obsolete media, software, and/or hardware that is no longer available. If it is not cost effective for the agency to procure services to convert/migrate data to a machine readable format for transfer, the agency must maintain and store the permanent electronic records onsite indefinitely. NARA guidance should include provisions regarding exceptions to the transfer of permanent electronic records that are no longer machine readable.
3. **Federal Records Center Program Costs.** Congress established NARA's Federal Records Center Program (FRCP) as a reimbursable program funded through an intra-governmental revolving fund in 1999 (Public Law 106-58 created the FRCP revolving Fund - codified at 44 USC §2901). The biggest obstacle to utilizing the FRCP is the cost of their services. Although the FRCP has provided prompt and attentive service when reviewing requirements, estimates to procure the assistance of the FRCP is prohibitive.
4. **Appraisal and Scheduling of Temporary records.** NARA Agency Services should recognize the need for expedited processing of requests to schedule records containing proposed temporary dispositions. It presents a challenge to cost effective and efficient records management policies and practices. During the past ten years the approval processes for temporary records series have averaged the same amount of time as that of permanent records series – more than a year. The lengthy approval process and limited number of appraisal archivists impedes effective oversight and could potentially result in erroneous disposals.

5. **Aging of the General Records Schedules.** The General Records Schedules (GRS) issued by NARA are not updated in a timely manner. As a result, a number of series have become obsolete and the nomenclature used (i.e. what a series is referred to as) has aged. Additionally, a number of series for critical program areas shared by all agencies (e.g. Environmental Health and Safety, and Privacy) are either absent, lack adequate guidance, or are out of date. GRS should be revised to reflect modern requirements beginning with those that are most frequently used.
6. **Policy and Requirements.** NARA policies and guidance are too broad and allow for ambiguous interpretation. For example, it would be helpful for NARA to take firmer positions on DOD 5015.2 compliance, Federal Records Management Certification; and Electronic Mail Management. If agencies are not required, but only suggested to take certain actions with respect to electronic records management, competing resource demands often lead to not providing enabling technology to support effective records management.
7. **Electronic Records Archive – Mandatory Use.** NARA internal policy requires that all agencies begin using the Electronic Records Archive (ERA) by the end of Fiscal Year 2012 to schedule and transfer records. In attempting to utilize this system, numerous application/system failed errors occur, in addition to issues working outside of inter-agency firewalls. Additionally the ERA does not have the ability to produce usable ad hoc reports. Substantive language changes to the relevant statutes and the Handbook for Federal Records Disposition are necessary in order to implement this requirement. For example, all of the records related statutes make reference to/identify exhibits for SFs 115, SFs 258, and use language that is otherwise obsolete in ERA. These statutes do not mandate nor reference to the use of ERA.

Section 2(b)(3) Identify policies or programs that, if included in the Records Management Directive required by section 3 of this memorandum or adopted or implemented by NARA, would assist the agency's efforts to improve records management. Please describe and justify each suggestion in 200 words or less. Enter agency 2(b)(3) response here [free form text field].

1. **Federal Enterprise Architecture (FEA) Records Management Profile (RMP) – Guidance/Policy Expiration.** Mandate the implementation and utilization of the Federal Enterprise Architecture (FEA) Records Management Profile (RMP). NARA Bulletin 2006-03 dated December 23, 2005, which required Federal agencies to build common and consistent records management procedures and processes into the Federal Agency enterprise architectures, information systems, capital planning, and investment process has expired. Re-issuance of a similar directive ensures that agencies integrate statutory records management requirements into all aspects of agency business operations.
2. **NARA Engaging Chief Information Officers (CIO) and Chief Technology Officers (CTO).** NARA's present practice is to issue guidance to Federal Records Officers and

request that this guidance is internally coordinated with the agency CIO/CTO. Due to the diverse nature of inter-agency organizational dynamics, CIOs/CTOs do not always fully engage with all records management and information life cycle stakeholders to ensure the systems that are deployed are compliant with regulatory guidance and best practices. This disconnect impedes the efforts of the agency's records management program to successfully achieve its goals and objectives. Periodic communications between the Archivist of the United States and the CIOs/CTOs in each agency, regarding their specific roles and responsibilities with respect to records management compliance (similar to the NARA BRIDG and Federal Records Council Meetings) would greatly assist agency records officers in closing this gap.

3. **Mandatory Implementation of Directives – Agency Support.** Mandatory implementation of records management tools, policies, and practices, such as those identified in Section 3 of the Presidential Memorandum on Managing Government Records, serves as a support vehicle in which agency Records Officers and staff rely upon when seeking approval for resources (vendor services and technologies) from agency senior officials for initiatives to improve the administration and implementation of government Records and Information Management Programs.
4. **Agency Evaluation – Records Management Applications (RMAs) Use.** Obtaining the necessary applications and/or tools to properly manage records throughout their life cycle has not been a major priority. NARA should evaluate agencies systems applications for compliance with RMA requirements, identify non-compliant systems/applications and enforce adherence to records regulations that address this issue.
5. **General Records Schedules Assistance.** Agency records have been identified and created which should be covered under the GRS, but do not exactly fit into the descriptions provided in the various schedules. At present, 36 CFR Subchapter B, Part 1227 does not have procedures for submitting requests to NARA for enhancements to the General Records Schedule. It would be helpful if NARA established a "Helpline" to provide assistance, address inquiries, and allow for agency feedback and suggestions for the GRS.
6. **Appraisal Archivists – Cross Training.** Newly assigned appraisal staff should be cross-trained at the agencies to which they are assigned. Cross training would ensure the Appraisal Archivists are familiar with the records management programs and the records types and functions of the agency to which they are assigned.