

Navigating a Year of Transition

A 2017 Playbook for Federal Records Management

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“As we transition to a new administration, 4100 new political appointees [are] coming to town. Your responsibility in terms of ensuring those people are trained about the rules and regulations around records management gives you an opportunity to pass on the importance of maintaining and preserving our records. So, thank you very much for the work you do.”

David Ferriero

Archivist of the United States, to 200 federal agency records professionals on February 14, 2017

SOURCE: NARA, <https://records-express.blogs.archives.gov/>

Executive Summary

Across the federal government, agency records managers respond to internal and external requests for information and work to achieve compliance with federal regulatory requirements for maintaining and preserving data, while simultaneously safeguarding classified and other personally identifiable information (PII). As federal agencies transition to electronic records to achieve compliance with the [2012 Managing Government Records Directive](#) and other mandates, they must also juggle exponential records growth, budgetary challenges and other mission-focused pressures, which is no trivial exercise.

That’s partly because the number and variety of records to be preserved is fluid, residing across a variety of platforms and technologies that the government utilizes every day. From digital documents, to emails, to social media posts, to text messages – the scope of records growth is staggering. And there are concerns as to whether federal agencies have a robust information management skillset to scale to meet ever-expanding records growth.

Fortunately, there are technologies, services and solutions available to help federal agencies achieve compliance and keep pace with agency goals for managing records electronically as they migrate to a variety of cloud services.

The need to migrate to electronic records management (RM) made news during the 2016 presidential election, when Hillary Clinton was investigated for using a personal email server for official business while serv-

ing as Secretary of State from 2009 to 2013. Email management practices also played a role in an IRS scandal related to missing tax-exemption determination files from an employee accused of playing politics. Those files were reportedly recovered at a cost of millions of dollars. While such incidents are regrettable, senior agency leaders need to understand how and why it's important to strengthen records management to avoid compliance issues--or worse--bad publicity, litigation and associated fines or other losses in the fallout from costly mistakes.

Indeed, the sheer volume of records, and an innate reliance on electronic devices and digital information flowing through government operations has expanded the scope of electronic RM to a critical challenge. Agency IT professionals and records managers understand they must provide secure storage, access and retrieval of government records. Federal records managers, along with agency personnel responsible for e-Discovery compliance are working hard to meet deadlines set by the 2012 Managing Government Records Directive, which mandated that all permanent electronic government records be stored electronically by 2019.

A critical first step in meeting the goals of the Directive centered on email records. To help agencies more easily achieve compliance with this first step, the National Archives and Records Administration (NARA) rolled out its [Capstone initiative](#), designed to help federal agencies manage permanent and temporary email records in accessible electronic formats by the end of 2016. Capstone refers to a designation for agency officials, who by the nature of their job titles must have their emails marked as permanent records by default. Those who aren't labeled Capstone still must have email records designated temporary, and held electronically for a pre-set time period. NARA's Capstone initiative prompts federal agencies to identify key personnel and designate Capstone accounts, capturing those email messages as permanent records. Not only

Federal Initiatives Impacting Records Management

The following is a list of legislation and other regulatory mandates driving improvements in federal RM:

The 2012 Managing Government Records Directive (M-12-18) can be reviewed at: <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

The Obama Administration also prioritized the disposal of unused/unnecessary real estate in OMB's, "Freeze the Footprint" policy which restricted the growth of warehouses for records storage. Read about it at: <http://www.whitehouse.gov/sites/default/files/omb/financial/memos/implementation-of-freeze-the-footprint-guidance.pdf>

The Open Data Policy, another Obama Administration Executive Order was written to make government information resources open and machine readable as a way to promote openness, and, wherever possible and legally permissible, to ensure that data is made easy to find, accessible, and usable. Details are available here: <http://www.whitehouse.gov/the-press-office/2013/05/09/executive-order-making-open-and-machine-readable-new-default-government>

The Data Center Optimization Initiative (DCOI) established by the OMB (M-16-19) superseded the prior Federal Data Center Consolidation Initiative (FDCCI) and fulfills the data center requirements of the Federal Information Technology Acquisition Reform Act (FITARA). Learn more at: <https://datacenters.cio.gov/>

In November 2015, Congress enacted legislation (H.R. 1233) to update the antiquated Federal Records Act which had made it difficult for federal records managers to handle the growing volume of electronic communications. This legislation was designed to overcome serious deficiencies with records management policies, practices and responsibilities across agencies in the past two administrations.

Last summer, the OMB also adopted revisions to the federal government's policies governing IT resources in [Circular A-130](#). Those revisions included an increased recognition of the role of records and information management (RIM) in the acquisition and management of information resources.

During 2017, Congress may advance legislation ([H.R. 5709](#)) to hold federal agencies accountable for failures in the retention and disposition of government records. The measure, known as the Federal Records Accountability Act, was approved unanimously by the House Oversight and Government Reform Committee in September 2016.

In addition, there is bipartisan support for a House Resolution ([H.R. 2319](#)) to codify the electronic preservation requirements of the Managing Government Records Directive to ensure agencies are devoting attention and resources to comply with requirements to manage e-mail in an electronic format.

Read more about the legislative initiatives at: <http://www.arma.org/r1/news/washington-policy-brief/2016/12/13/new-administration-has-opportunity-to-expedite-records-management-reforms-arma-says>

permanent records are archived, but also relevant metadata and attachments. By implementing NARA's Capstone initiative, agencies can cut down on the number of emails that must be preserved, and generate a more uniform strategy for archiving e-mail records across the federal government. As of early 2017, a large majority of agencies (79%)* say they will implement Capstone, but it remains unclear how many met the 2016 deadline for managing email electronically until the next NARA RM self-assessments and SAO reports are published.

Once the management of email is handled electronically, the next step in the directive compels agencies to manage all permanent electronic records electronically, including documents, SharePoint files and other record types, by the end of 2019.

While agencies still face challenges in securing resources, funding and top management support to meet the Directive goals, most understand electronic RM is a necessity, given the ubiquity of online data and devices now in use. They also understand optimizing RM is about more than reorganizing and filing records. It is about enabling agency personnel to search, locate and review information to make better and faster decisions. By optimizing records storage and management, they can help agencies more quickly and efficiently achieve critical mission goals.

During the first year of a new presidential administration, federal agencies are currently adjusting to new demands and obligations. Yet, the demand for electronic records continues to rise, and the deadlines of the 2012 Directive remain intact. This is why it's important to seek solutions that comply with federal cloud services migration initiatives such as [FedRAMP](#). And it's also important to implement NARA's Capstone guidance, or a similar approach, to further streamline the migration of agency email records.

Since the Dec. 2016 deadline for managing email messages has passed, there will be multiple federal oversight organizations judging agency efforts to electronically manage email records. Among them, the Office of Management and Budget (OMB) and NARA will annually track agency electronic records performance. In addition, the Department of Justice, the Government Accountability Office (GAO) and even Congress may start questioning agency personnel about the efficacy of their electronic email management capabilities in any future hearings.

That's why this playbook was created. Veritas wants to help agencies get and stay on track to complete initiatives to capture and maintain government records electronically.

*National Archives and Records Administration (NARA), [Records Management Self-Assessment \(RMSA\), 2015](#)

NARA's Role

NARA maintains only those federal records that are judged to have continuing value—about 2 to 5 percent of those generated in any given year.

By now, this adds up to a formidable number, approximately 10 billion pages of textual records; 12 million maps, charts, and architectural and engineering drawings; 25 million still photographs and graphics; 24 million aerial photographs; 300,000 reels of motion picture film; 400,000 video and sound recordings; and 133 terabytes of electronic data.

All of these materials are preserved because they are important to the workings of government, have long-term research worth, or provide information of value to citizens.

Source: NARA, <https://www.archives.gov/publications/general-info-leaflets/1-about-archives.html>

Electronic Records Management

A 2017 Playbook

Listed below is a best-practice, step-by-step approach to managing records electronically. This playbook was created to provide a roadmap for federal agency personnel charged with migrating agency records to electronic formats, along with their managers and other agency stakeholders. Records managers fully understand the value of information governance. The goal of this playbook is to enhance agency best practices in electronic RM, by providing some specific steps agency personnel can take to make headway on the journey to electronic RM. By implementing these steps, both IT and Records Management in agencies will make permanent agency records searchable and easily retrievable, to aid in speeding insights and decision making.

Step 1: Capture all email messages, by user

Government agency records managers must capture a journal feed of all email content from personnel deemed to be Capstone members. Because their email is considered part of permanent government records, each agency must set up an official Capstone group, most likely in Microsoft Office 365 (the most widely used email program.) For this Capstone user group, all email is captured and must be stored and maintained in a permanent records archive.

Step 2: Capture all files, and archive official/permanent records

Once the first step is completed, start working beyond email records. The primary goal of the 2012 Directive targeted maintaining all electronic records electronically by 2019. This step can be completed by assigning a default record type, either permanent or temporary, to every file created. With the right tools in place, records managers should be able to identify who owned, or created each file, and monitor log files to understand who has accessed or edited each agency file. The amount of action taken on a single file, for example, may help determine that file's importance for preservation, or for possible deletion at a future point in time.

Step 3: Automate provisioning to assign record types

Depending on the file type and content enclosed, records managers can set parameters to determine if a file should be considered part of the agency's permanent records, before archiving. If, for example, the file was authored by a member of the agency's pre-determined Capstone group, it should be marked as a permanent record, and archived accordingly. In this step it's also important to determine file ownership and where records already reside inside the agency. With the help of proper file analysis and monitoring tools, government records managers can sift current files to more easily identify risk hazards in a file and remediate risks to ensure every file is accurately assessed, stored and protected, based on the ownership and content of each file. The tools available also help agencies track data use and activity on every file, along with metadata and ownership and secured permissions included on each file. By classifying data and records, every agency can quickly determine which records should be deemed permanent. Through the addition of automated file analysis tools, for example, records managers can monitor all files and information on file ownership, to determine if content should be deemed temporary or permanent.

Step 4: Automate the classification of records

An information classification tool can help automate the process of archiving and retaining files, and aid in securing files for data loss prevention (DLP) purposes. Such a tool can mark files as permanent or temporary records and tag records that are best used to fulfill Freedom of Information (FOIA) requests, Congressional requests, e-discovery purposes, or other specific regulatory compliance. Even after files are archived for a preset time period, records managers can use such tools to help reclassify existing archived content to determine if it must remain in the permanent archive. Records managers may also choose to add classification tags to certain records to make them easier to discover. For example, once news stories broke about Russian Ambassador Sergey Kislyak's meetings with senators and campaign officials, there was an immediate increase in FOIA and Congressional requests for information pertaining to records about him. Agency personnel could add a classification tag such as 'Russian Controversy' to any communication found that included Sergey Kislyak's name, to ease discovery and speed responsiveness for FOIA and other Congressional requests.

Automated classification tools and/or services can help infuse agency data with lifecycle intelligence, to ensure each agency focuses on the information that matters most to its primary mission goals and regulatory requirements. Gated deletion, for example, provides the ability to complete a final check against current policies, prior to deleting, when an item reaches its expiration date in the archive. For example, when originally archived, an email about Benghazi may have originally been deemed a temporary record. But once controversy arose, new rules were implemented to tag all items related to Benghazi and retain them as permanent records. Email messages and other records that were captured before the rule update would be retested upon reaching their expiration date via gated deletion, to stop and reclassify those messages or files as permanent records for proper retention.

Classification is also a great way to remove content that isn't worth preserving as it serves no purpose. Proper classification of files can help agency personnel override the default of keeping everything created by someone deemed to be a Capstone records maker.

Step 5: Enable (qualified) users to reclassify messages and files

Users who are asked to re-examine files must have a trust relationship inside the agency. By allowing specific users to search records by type and record ID information, it may be possible to reclassify files or apply new rules that allow users to override default retention policies. This can be used to further aid in the deletion of personal, non-government email messages or spam email messages, for example. End users can also help improve the RM process by setting a classification level on files that contain PII or other sensitive information. It's important to ensure this step is available both manually and automatically, no matter which tools are used.

Step 6: Confidently delete temporary records

Once permanent records are exported to archival storage in a NARA-compatible format, the next step is to optimize and consolidate the storage of all other records, to reduce the amount of data that must be stored. As government organizations have worked over the last decade to optimize data center operations and reduce their carbon footprints, it has grown clear that if they don't fully understand what content must be stored electronically, they are forced to keep everything. With consolidation initiatives likely to continue in years ahead, agency IT operations can be expected to pursue storage optimization, which will likely also intensify each agency's focus on RM, and in particular, which files must be retained for specific time periods, or archived as permanent agency records.

Step 7: Regularly export Capstone records

Once files have been properly identified as permanent records, it's also important to automate the export of those records to NARA as per regulatory timing requirements, using a NARA-approved file format for storage and/or retrieval.

Best Practice Advice

The multiple various information types in use across government make it nearly impossible for agencies to adequately manage records, especially using aging legacy, and/or in-house systems that may delay FOIA requests and hinder efficient operations. This is why agencies leading the electronic RM charge want to manage all records in a unified, cohesive manner for consistent policy application, governance and to streamline efficiency (to lower both risks and costs). At the other end of the spectrum, some agencies still view the Directive as another unfunded initiative. These organizations may not meet required deadlines, preferring to maintain the status quo, and wait for additional guidance and/or funding to invest in RM.

For now, agencies are only required to manage electronic permanent records electronically, but most are likely to move toward managing all permanent electronic records electronically because the operational drivers to do so are strong. It's far easier, for example, to minimize the number of records needed for e-discovery responses, or to optimize records retention for advanced analytics (think big data). Electronic record-keeping can help agencies address these and other challenges as they strive to modernize, stay relevant, and become more data-driven in their decision making. A focus on holistic information governance that leverages automation where possible will help agencies make real progress toward more streamlined operational efficiency. By working toward this goal, any agency can learn to better balance budgetary, resource and management requirements to achieve and refine their most mission-critical goals.

Additional Tips and Techniques

Here are some additional ideas for streamlining and optimizing agency record management practices:

Gather senior management support – Retention policies continually evolve to comply with regulatory and operational requirements, which is why it's important to bring together leaders from all agency functions, including IT, finance, operations, legal/compliance and cybersecurity along with agency records officers, to help implement and enforce records and information management policies.

Invest in training – Training/education at all levels of the agency helps improve accountability and responsibility for RM, and help ensure all employees understand why records management is important.

Use classification to tag content for easier retrieval – Leverage automatic classification tools to find PII and other sensitive information that require protection or redaction from FOIA requests. Classification can tag PII items to minimize the time it would take to redact specific content.

Automate digitization processes – With the right tools in place, agencies can automate classification of all ingested content, including emails, files, Instant Messages, social media and other record types. Agencies need the ability to customize classification policies and retain or discard records, and tag an item for faster search discovery or supervisory review. It's easier to digitize the records most needed, and to delete/destroy older records no longer needed for compliance and/or daily operations.

Classify records by user – When owners can be identified, it's easier to determine what must be permanently archived leveraging automated classification to remove junk, find permanent records from users not deemed as Capstone, tag specific files that contain PII, or other sensitive data. Records retention may also be refined with manual updates completed either by the user, or by selected trusted individuals.

Gain a quick win from 'orphaned' data – Agencies can realize a very quick win in improving records management efficiency by looking for orphaned data and deleting that which is no longer relevant to the agency. In a transitional year, this may be a great place to start, because orphaned data often includes very large files of pictures, videos and messaging that are now without an owner. And in many cases these files can be removed from archives and back up environments to free up valuable space.

Streamline deletion – Implementing policies for gated deletion can help agencies perform proper checks and update retention periods on individual items if rules and/or policies change. This also helps agencies avoid the mistake of keeping everything and helps adjust to changing policies and changing views on what is deemed to be a record. With the right tools in place, agencies can even implement NARA's 'Capstone-style' approach to RM, which supports marking archived items as permanent or temporary records.

NARA's Advice for New Agency Appointees

NARA also offers tips for agency personnel working to onboard new appointees. Read about it: <https://www.archives.gov/files/records-mgmt/publications/rm-for-political-appointees.pdf>

Looking Ahead

Exponential data growth has generated storage, efficiency and cost challenges that federal agencies have already addressed by consolidating data centers and opting for 'cloud-first' operations. To further streamline RM and comply with federal oversight, agencies can now choose to adopt either physical or cloud-based solutions to help improve efficiency by targeting and classifying stored content using holistic information governance.

Veritas is committed to helping federal agencies gain a stronger understanding of their data so they can gain greater insight to make better decisions. This is why Veritas partnered with industry leader Microsoft, to provide Azure-based cloud services that can help agencies quickly meet RM mandates.

Veritas Enterprise Vault™ 12.1 meets Directive goals for managing both permanent and temporary email records in accessible electronic formats. This solution is available either on premises, or as a FedRAMP Authorized SaaS-level, moderate impact cloud service. Enterprise Vault 12.1 is also the first data archiving solution to be made available as a FedRAMP authorized cloud service built to address NARA's Capstone approach to email management. In addition, to help meet federal requirements for e-Discovery, Veritas eDiscovery Platform is also available as a FedRAMP authorized SaaS service.

Federal IT management and agency records officers by now understand they must find a way to automate and streamline RM, as much as possible to achieve compliance and meet records digitization goals for

2019 and beyond. Veritas' suite of information governance solutions can help. These solutions are already used by tens of thousands of customers worldwide, including 86 percent of global Fortune 500 companies and more than half of the largest U.S. federal agencies. Veritas is also the only supplier to be recognized as a leader in the Gartner "[Magic Quadrant for Enterprise Information Archiving](#)" for 13 consecutive years.

Veritas stands ready to help any agency quickly and effectively address the Managing Government Records Directive, helping to streamline agency policies and simplify the transition to electronic-based records management to keep pace with ever-evolving demands.

For more information, please visit veritas.com/solution/government.

The Veritas logo is displayed in white, uppercase letters on a dark red background. The background of the entire slide features a geometric design with overlapping triangles in shades of red and grey.

Veritas public sector compliance for Enterprise Vault™ and Data Insight

- **FIPS 140-2:** Compliant
- **IPv6:** Compliant
- **FedRAMP:** Not applicable (as on-premise solutions). However Enterprise Vault is available as a hosted solution via BlueSource EV/247 a FedRAMP-Authorized, SaaS level , moderate impact cloud service.
- **At-Rest Encryption:** Compliant
- **In-flight Encryption:** Compliant
- **Section 508:** Compliant
- **DOD5015:** Compliant (in early stages of certification. Expected later this year)
- **Secure Erasure:** Compliant