



Office of the Chief
Records Officer for the
U.S. Government

Sent Via Email. No Hard Copy to Follow.

June 1, 2023

Robin White
U.S. International Development Finance Corporation
1100 New York Avenue, NW
Washington, DC, 20527

Dear Robin White,

The National Archives and Records Administration (NARA) has received U.S. International Development Finance Corporation's (DFC) self-report on a possible unauthorized disposition of email records from Capstone officials from 2014-2020. Capstone officials dating back to 2014 were not formally identified and categorized until 2022 by the current Office of Information Technology (OIT) team.

NARA acknowledges the efforts taken by the DFC since August 2021 to improve DFC's records retention capabilities pertaining to Capstone officials. Once the list of Capstone officials was provided, DFC attempted to locate and archive all email records of Capstone officials who have departed the agency since 2014 and preserve them in a data archive. Prior to 2014 and the adoption of the Capstone approach, a print-and-file policy was enforced.

However, there is a concern for the following: individual accounts that did not have Capstone retention applied prior to December 2020, the data of employees that departed before December 2020 still pending retrieval, and the non-use of the legacy data to cross-reference with the potential missing data. This case will remain open until DFC provides the outcome of the process to retrieve the data from the employees that departed prior to December 2020. If more time is needed to complete your investigation, please submit an interim report describing the plan for review and a timeline to complete this review.

Thank you for your assistance in this matter. If you have any questions or wish to discuss this further, please contact me at laurence.brewer@nara.gov

Sincerely,

A handwritten signature in blue ink that reads "Laurence N. Brewer". The signature is written in a cursive, flowing style.

LAURENCE BREWER
Chief Records Office
for the U.S. Government

cc: Keron White, Vice President and Chief Administrative Officer, SAORM



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November 22, 2023,

Robin White
U.S. International Development Finance Corporation
1100 New York Avenue, NW
Washington, DC, 20527

Dear Robin White

The National Archives and Records Administration (NARA) received the U.S. International Development Finance Corporation's (DFC) self-report on a possible unauthorized disposition of email records of Capstone officials from 2014-2020. Capstone officials dating back to 2014 were not formally identified and categorized until 2022 by the current Office of Information Technology (OIT) team.

NARA acknowledges the efforts taken to improve DFC's records retention capabilities pertaining to Capstone officials. Upon completion of the DFC's first review, the OIT team was able to retain the data for employees who have separated from the agency, except for the employees previously disclosed via email. NARA requested that DFC provide additional information for the following items: individual accounts that did not have the Capstone retention applied prior to December 2020; the data of employees that departed before December 2020 still pending retrieval; and the non-use of the legacy data to cross-reference with the potential missing data.

The OIT team was able to identify the gap in the legacy technical control process where not all data was being retained. Documentation was provided, showing there is no ability to recover the lost data. New M365 Data Lifecycle Management policies have been implemented where all employees' data will be retained for 7 years and Capstone officials' data will be retained until transfer to NARA for preservation.

Based on the information provided in your report, NARA considers this matter resolved. Thank you for your attention to this matter. If you have any questions, please contact me at laurence.brewer@nara.gov.

Sincerely,

A handwritten signature in blue ink that reads "Laurence R. Brewer". The signature is written in a cursive style with a large initial 'L'.

LAURENCE BREWER

Chief Records Office

for the U.S. Government

cc: Keron White, Vice President and Chief Administrative Officer, SAORM