



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

Sent Via Email. No Hard Copy to Follow.

October 15, 2024

Beatriz Collazo
Department Records Officer
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250-1150

Dear Ms. Collazo,

The National Archives and Records Administration (NARA) received the U.S. Department of Agriculture's (USDA) preliminary report regarding the potential unauthorized disposition of agency records. This report indicates that in 2023, USDA's Office of the Chief Information Officer (OCIO), was contacted by Google concerning approximately 12,000 "private accounts" dating back to 2010 containing approximately 770 GB of data in Google mail and drive that was created by USDA personnel utilizing their usda.gov email address for verification purposes. Because the "private accounts" fall under the Terms of Service signed upon account creation, Google is unable to provide USDA any records associated with the email addresses and is unable to identify what records and information is stored in these accounts.

NARA acknowledges that as of December 2023, USDA, using the list of approximately 12,000 account holders, continues its attempts to contact individual account holders (including over 2000 former USDA employees) with more than 4500 remaining.

NARA also acknowledges USDA's planned implementation of the following safeguards:

- Update the Departmental Regulation on Records Management to include additional requirements concerning external/private email accounts and update/clarify any existing requirements;
- Update onboarding and annual Records Management training and guidance to clearly include requirements concerning creation of external/personal email accounts;
- Update the Departmental Regulation on Records Management Policy for Departing Employees, Contractors, Volunteers, and Political Appointees to update/clarify and include additional requirements concerning external/private email accounts;
- Update the Exit Checklist Form to include questions/certifications concerning USDA records in external/non-USDA email accounts;

- Coordinate with USDA OCIO/Cybersecurity/Data Loss Prevention to determine a method to ensure staff cannot open non-enterprise email accounts;
- Properly communicate tools for services specific to Google, such as Google Forms, Google Surveys, etc.; and
- Coordinate with USDA OCIO to ensure requirements related to creation of external/non-USDA email accounts are clearly stated in the annual USDA Information Security Awareness (ISA) Training and Rules of Behavior (ROB).

To satisfy all requirements of 36 CFR 1230.14 please provide the following information: (1) of the associated USDA email addresses how many of them are capstone accounts, (2) identify which USDA components or program offices are represented among the 12,000 accounts, (3) an explanation, to the extent possible, as to why USDA personnel may have created the accounts using their USDA email addresses, and (4) regarding the salvage efforts, how many account holders have been contacted, responded, and provided any federal records from their personal Google mail account.

This case will remain open until the OCIO has completed its recovery efforts and the requested information is provided. Thank you for your commitment to improving your records management practices.

Sincerely,

A handwritten signature in black ink that reads "William Fischer". The signature is written in a cursive, slightly slanted style.

WILLIAM FISCHER
Chief Records Officer
for the U.S. Government (Acting)