

Capstone Implementation Briefing

Project Update – Final



Capstone Concept

- Why Capstone?
 - All Federal agencies are required to manage their emails records electronically by December 31st 2016 “OMB/NARA Managing Government Records Directive (M-12-18)
- What is Capstone?
 - New Approach to Managing Email Records.
 - Not a software application, it is an approach.
 - Management of email records, based on the role position and or responsibility of an email account user rather than on the content of the emails.
 - Manage email records at the account level.

With Your Help

- CFPB Records Management Office (RMO) has:
 - Received approval for a Tier 2 record schedule;
 - Received approval the Capstone Officials list;
 - Incorporated Capstone policy to the CFPB RM policy;
 - Identified and Created (5) Capstone Business Processes;
 - Successfully completed a Capstone Implementation Review (CIR), and
 - Successfully completed a Capstone Pilot.

Capstone Project Approach

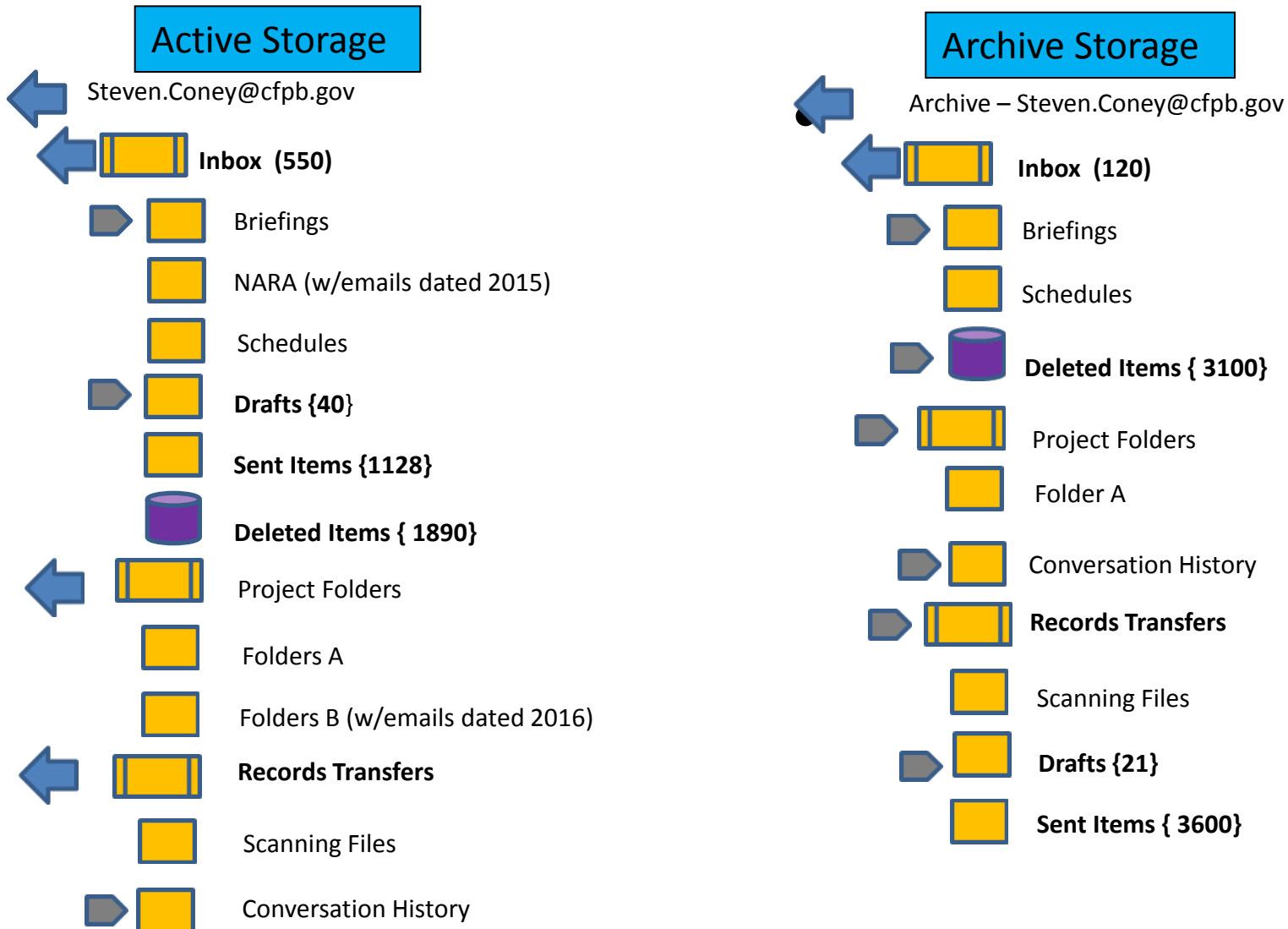


<ul style="list-style-type: none"> • Bureau email records status • Capstone • Meeting with all Divisions • Defining Tiers • Identifying Capstone accounts • Senior Buy In 	<ul style="list-style-type: none"> • Requirements gathering/review • Limitations • Policies & schedule • Capstone Officials list approved internally • Draft/submit Capstone record schedule 	<ul style="list-style-type: none"> • Technical implementation • Configuration • Business processes development • Capstone list sent to NARA • RMO internal Capstone Review • Ongoing Communication 	<ul style="list-style-type: none"> • Testing Capstone pilot group • Training & awareness • Tier 2 Schedule approved by NARA • Capstone Officials list approved by NARA • Capstone Officials Notified 	<ul style="list-style-type: none"> • Transition timelines • Legacy emails transfer • Complete accounts Transition
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Implementation Phase Approach

Division	Deployment Date
Operations	20 Jan 2017 – 26 Jan 2017
SEFL	3 Feb 2017 – 8 Feb 2017
EA	17 Feb 2017 – 22 Feb 2017
CEE	3 Mar 2017 – 8 Mar 2017
RMR	24 Mar 2017 – 29 Mar 2017
Legal	7 Apr 2017 – 12 Apr 2017
Office of the Director	21 Apr 2017 – 26 Apr 2017

Capstone Email Management



CFPB Email User Tier Groups

**Tier 1- Permanent
Capstone Officials
Transfer to NARA**

Director, Deputy Director, COS,
Associate Directors
(All 6 Division Heads),
CFO, CIO, CHCO, and Deputy
GCs

**Tier 2- Temporary
15 Years Destroy**

Deputy Associate Dir, Assistant
Dir, (Dir OEOF), Exec Secretary,
COS, and Legal Division





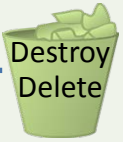
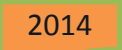




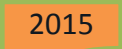








**Tier 3- Temporary
7 Years Destroy**

Deputy Assistant Directors, and
most other Employees not listed
in another Tier.

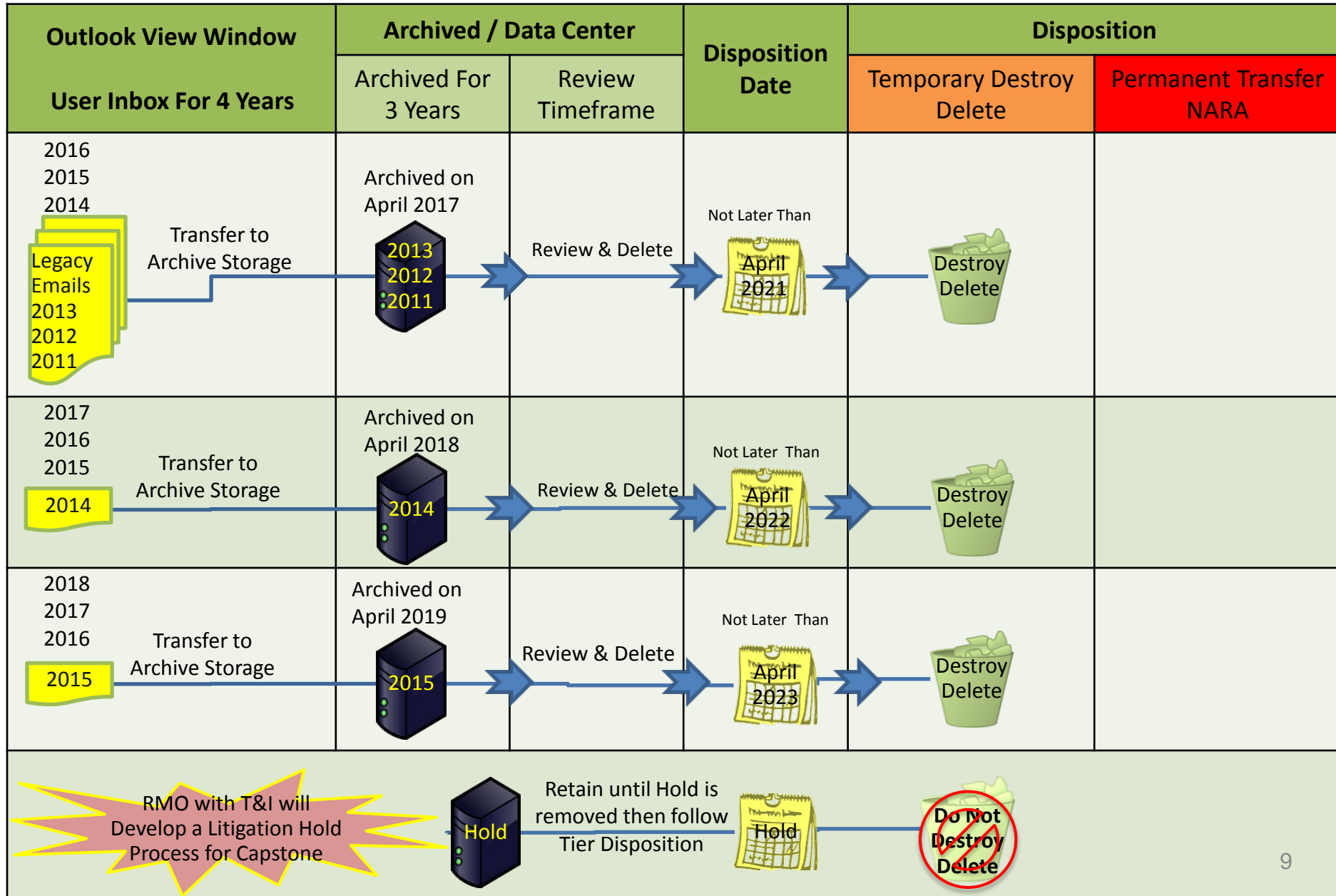
**Tier 4- Temporary
3 Years Destroy**

Interns & Contractors

Capstone Temporary Email Tier 2 (15yrs.) Sample Starting April 2017

Outlook View Window User Inbox 4 Years	Archived / Data Center		Review/ Disposition Date	Disposition	
	Archived For 3 Years	Retention Timeframe		Temporary Destroy Delete	Permanent Transfer NARA
2016 2015 2014  Transfer to Archive Storage	Archived on April 2017 	 Retain 8 Years	Not Later Than 	 Destroy Delete	
2017 2016 2015  Transfer to Archive Storage	Archived on April 2018 	 Retain 8 Years	Not Later Than 	 Destroy Delete	
2018 2017 2016  Transfer to Archive Storage	Archived on April 2019 	 Retain 8 Years	Not Later Than 	 Destroy Delete	
  Retain until Hold is removed then follow Tier Disposition  					

Capstone Temporary Email Tier 3 (7 yrs.) Sample Starting April 2017



Key Points

1. Know your Tier-grouping and email record retention
 - Tier – 1 Permanent
 - Tier – 2 Temporary 15 years
 - Tier – 3 Temporary 7 years
 - Tier – 4 Temporary 3 years
2. If you created an archives folder, rename it. (legacy, etc.)
3. Delete useless information, non-record material and personal information
4. You can search forward, copy, and print email records from the Capstone archive
5. Group email accounts are in Tier -3 Temporary 7 years
6. Manage your email records outside of the Capstone archive when required by your office business practice

Records Management Office

Any Questions?

Steven Coney
Bureau Records Officer

Ye Ho “Leo” Kim
Senior Records Specialist

Eric Stewart
Records Specialist (Contractor)

Capstone FAQs are located on the RMO Wiki page



Consumer Financial
Protection Bureau

1700 G Street, N.W., Washington, DC 20552

March 19, 2021

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

RE: Senior Agency Official Annual Report

Dear Mr. Ferriero:

In accordance with the June 28, 2019, Office of Management and Budget (OMB) / National Archives and Records Administration (NARA) Transition to Electronic Records Memorandum (M-19-21), the Consumer Financial Protection Bureau (CFPB or the Bureau) conducted an evaluation of its records and information management program and has developed this Senior Agency Official (SAO) Annual Report. This SAO Annual Report documents the Bureau's continued progress toward the successful implementation of OMB / NARA M-19-21.

Name of SAORM: Donna Roy
Position Title: Chief Operating Officer
Address: Consumer Financial Protection Bureau
1700 G Street, NW Washington, DC 20552
Office Telephone Number: 202-435-5172
Email: Donna.Roy@cfpb.gov

1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.

- The Consumer Financial Protection Bureau

Please provide a list, and also indicate any that are new or have been changed due to reorganization or other circumstances.

2. Has the COVID-19 pandemic changed any policies or practices related to records management at your agency?

X Yes

- No
- Do not know

Please explain your response (include details of specific challenges, if applicable):

The Records and Information Management program modified the Records Liaison Officers (RLO) training and workshops to support the remote environment, instead of specifically meeting with RLOs within their offices, reviewing records in file cabinets, and transferring hardcopy records, the RIM program focused on electronic records, email management, electronic messaging systems, file plans, data/records management, and folder structures updates.

3. Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)

- Yes
- No
- Do not know

Please provide details on what support is needed:

In October 2019, the Bureau established the Office of the Chief Data Officer (OCDO) within the Operations Division by elevating the Chief Data Officer as a peer to the Chief Information Officer and a direct report of the Chief Operating Officer, aligning the Bureau's companion data and compliance functions. The OCDO is currently comprised of the Records and Information Management (RIM), Freedom of Information Act, Privacy, Data Policy and Governance, Paperwork Reduction Act, and Knowledge Management programs. Additional staffing is needed within the RIM program to develop the Bureau's Controlled Unclassified Information program.

4. Has your agency made progress towards managing all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)

- Yes
- No
- Do not know

Please explain your response (include specific goals and example metrics):

The Bureau continues to make progress towards M-19-21, 1.2. Since our last update, CFPB implemented Microsoft Office (365) as our primary system to manage permanent

electronic records in an electronic format. In addition, the Bureau migrated permanent and temporary records from our shared drives to Microsoft Office (365), and applied retention policies on folders within the system. The system has the capability to auto-classified and apply the proper retention policy to newly created records which will allow for an effective and efficient transfer of electronic records to NARA.

5. Has your agency made progress towards managing all temporary records in an electronic format by December 31, 2022? (M-19-21, 1.3)

- Yes
- No
- Do not know

Please explain your response (include specific goals and example metrics):

The Bureau continues to make progress in managing temporary records in electronic format by digitizing temporary records with long retention schedules, and ensuring temporary records schedule meet the needs of the Bureau. In addition, the Bureau no longer stores any temporary records at Federal Records Centers operated by NARA. The Bureau currently manages nearly ninety five percent of its temporary records in digital formats, with the implementation of Microsoft Office 365, and we anticipate a steady reduction in hard copy temporary records over the next few years.

6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?

- Yes
- No
- Do not know

Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes. If No or Do not know: Please explain.

The Bureau has already invested significant resources in obtaining and implementing Microsoft Office 365, however there are additional compliance functionality that will be added to enhance users experiences, records and information management compliance, and support staff with identifying and marking Controlled Unclassified Information (CUI) documents and emails.

7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)

- Yes

- No
- Do not know

Please explain your response (include specific goals and example metrics):

The Bureau does not operate an agency records center, and does not store any temporary or permanent records at NARA operated Federal Records Centers. The Bureau's only commercial records management storage facilities are managed by NARA approved 36 CFR 1234 Iron Mountain locations.

8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and outgoing senior officials* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?

*Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions.

- Yes
- No
- Do not know

Please explain your response (include specific details of policies and procedures):

The Bureau's Records and Information Management program ensures that all Senior Officials' federal records created or received in all formats are identified, captured, and preserved in the system in which they were created or received. In addition, specific records and information management training is provided throughout the year. This includes documenting Senior Officials public services, use of personal email, electronic messaging, and other recordkeeping requirements. RIM actions include the following:

- Conducting records and information management briefings as part of Senior Official's orientation;
- Conducting groups and in person records and information management briefings for Senior Officials;
- Conducting mandatory web-based records and information management training for Senior Officials annually;
- Publishing email, text and instant messaging guidance bi-annually;
- Conducting records management departure briefings for Senior Officials

- Conducting RIM sweeps of departed Senior Officials offices;
- Applying permanent record holds on Senior Officials accounts; and
- Conducting RIM reviews of laptops of departed Senior Officials.

9. Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?

- Yes
 No
 Do not know

Please explain your response (include details of specific challenges, if applicable):

The Bureau continues to make progress towards fully electronic recordkeeping with the implementation Microsoft Office 365, best practices, and guidance forthcoming, the Bureau is well on its way to meeting this goal.

10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?

- Yes
 No
 Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

The Bureau does not have any suggestions for improving engagement at this time.

Contact information:

Name: Mr. Steven Coney
Title: Records Officer
Email: steven.coney@cfpb.gov
Address: 1700 G Street N.W., Washington, DC 20552
Phone: (202) 435-7495

Sincerely,

Donna Roy

Chief Operating Officer

Bureau of Consumer Financial Protection
1700 G Street NW
Washington, D.C. 20552



January 27, 2020

Nick Marinos
Director, Information Technology and Cybersecurity
Government Accountability Office
441 G Street, NW
Washington DC, 20548

Dear Mr. Marinos,

Thank you for the opportunity to review and comment on the draft report by the Government Accountability Office (GAO), titled *Information Management: Selected Agencies Need to Improve Adherence to Federal Electronic Recordkeeping Requirements* (GAO-20-59). The Bureau greatly appreciates GAO's work over the course of this engagement and believes the report provides the public with important information about how select federal agencies, including the Consumer Financial Protection Bureau, have been working to implement the Federal Records Act and related directives from the National Archives and Records Administration (NARA) with respect to the maintenance of electronic records.

In the report, GAO makes one recommendation to the Bureau:

- The Director of CFPB should establish a time frame to develop an inventory of electronic information systems used to store agency records that includes all of the required elements.

The Bureau does not object to GAO's recommendation. The Bureau will establish a time frame to update its current inventory of electronic systems used to store agency records, so that the inventory includes all of the elements required by 36 C.F.R. 1236.26.

consumerfinance.gov

The Bureau looks forward to working with GAO as it monitors the Bureau's progress in implementing this recommendation.

Sincerely,



Kathleen L. Kraninger
Director

Request for Records Disposition Authority

Records Schedule Number DAA-0587-2019-0002
Schedule Status Proposed

Agency or Establishment Bureau of Consumer Financial Protection
Record Group / Scheduling Group Records of the Consumer Financial Protection Bureau
Records Schedule applies to Agency-wide
Schedule Subject Home Mortgage Disclosure Act Data and Related Records
Internal agency concurrences will be provided No

Background Information The Bureau of Consumer Financial Protection (BCFP) provides a single point of accountability for enforcing federal consumer financial laws and protecting consumers in the financial marketplace.

Records created and received relate to the mission critical functions and the internal administration of the Bureau required for compliance with the governing principles of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010:

- 1) To regulate the offering and provision of consumer financial products or services under the Federal consumer financial laws and to educate and empower consumers to make better informed financial decisions.
- 2) Free, innovative, competitive, and transparent consumer finance markets where the rights of all parties are protected by the rule of law and where consumers are free to choose the products and services that best fit their individual needs.

The Home Mortgage Disclosure Act (HMDA), 12 U.S.C. 2801 through 2810, requires certain depository institutions and for-profit non-depository institutions to collect, report, and disclosed data about originations and purchase of mortgage loans, as well as mortgage loan applications that do not result in origination (for example, applications that are denied or withdrawn). The purpose of HMDA are to provide the public with loan data that can be used: (i) to help determine whether financial institution are serving the housing needs of their communities; (ii) to assist public officials in distributing public-sector investment so as to attract private investment to areas where it is needed; and (iii) to assist in identifying possible discriminatory lending patterns and enforcing antidiscrimination statues.

In 2010, Congress enacted the Dodd-Frank Act, which amended HMDA and also transferred HMDA rulemaking authority and other functions from the Board of Governors of the Federal Reserve System (Board) to the Bureau.

HMDA records was formerly scheduled under the Board of Governors of the Federal Reserve System (Board) N1-082-05-1.

All Reporters submit their HMDA data directly to the Bureau. The Bureau maintains, operates, and manages the HMDA database on behalf of all participating agencies, including the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, , the National Credit Union Administration, and the FFIEC. The Bureau prepares the disclosure forms required by HMDA, provides them to reporters, compiles aggregate data and aggregates the data by Metropolitan Statistical Area (MSA), and makes HMDA data available to the public as required by law.

Item Count

Number of Total Disposition Items	Number of Permanent Disposition Items	Number of Temporary Disposition Items	Number of Withdrawn Disposition Items
12	8	4	0

GAO Approval

Outline of Records Schedule Items for DAA-0587-2019-0002

Sequence Number	
1	Master HMDA Data Files.
1.1	Non-Restricted Ultimate (TS and LAR) Data File. Disposition Authority Number: DAA-0587-2019-0002-0001
1.2	Non-Restricted Final (TS and LAR) Data File. Disposition Authority Number: DAA-0587-2019-0002-0002
1.3	Restricted Ultimate (TS and LAR) Data File. Disposition Authority Number: DAA-0587-2019-0002-0003
1.4	Restricted Final (TS and LAR) Data File. Disposition Authority Number: DAA-0587-2019-0002-0004
1.5	Final Panel Data File. Disposition Authority Number: DAA-0587-2019-0002-0005
1.6	Ultimate Panel Data File. Disposition Authority Number: DAA-0587-2019-0002-0006
2	Reports.
2.1	Aggregate Report. Disposition Authority Number: DAA-0587-2019-0002-0007
2.2	National Aggregate Report. Disposition Authority Number: DAA-0587-2019-0002-0008
2.3	Disclosure Statements. Disposition Authority Number: DAA-0587-2019-0002-0009
2.4	Intermediate Files and Ad Hoc Files and Reports. Disposition Authority Number: DAA-0587-2019-0002-0010
3	Input Files. Disposition Authority Number: DAA-0587-2019-0002-0011
4	Documentation. Disposition Authority Number: DAA-0587-2019-0002-0012

Records Schedule Items

Sequence Number	
1	<p>Master HMDA Data Files. HMDA data is derived from the Loan Application Register (LAR) and Transmittal Sheets (TS) submitted to the Bureau. Reporting panel data includes lists of the Reporters' MSA's. There are two categories of data, "final" and "ultimate". Unrestricted "final" versions of data are made available to the public. "Ultimate" files are made available to the public and include adjustments to the data incorporated in the 24 months following the reporting deadline.</p>
1.1	<p>Non-Restricted Ultimate (TS and LAR) Data File.</p> <p>Disposition Authority Number DAA-0587-2019-0002-0001</p> <p>Final Disposition Permanent</p> <p>Item Status Pending</p> <p>Is this item media neutral? Yes</p> <p>Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? Yes</p> <p>Do any of the records covered by this item exist as structured electronic data? Yes</p> <p>Disposition Instruction</p> <p>Cutoff Instruction Cut-off when revisions to data are completed.</p> <p>Transfer to the National Archives for Accessioning Transfer copy of the data with documentation to NARA annually in accordance with 36 CFR 1228.270.</p> <p>Additional Information</p> <p>What will be the date span of the initial transfer of records to the National Archives? From 2017 To 2017</p> <p>How frequently will your agency transfer these records to the National Archives? Every 2 Years</p>
1.2	<p>Non-Restricted Final (TS and LAR) Data File.</p> <p>Disposition Authority Number DAA-0587-2019-0002-0002</p>

	Final Disposition	Permanent
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Cutoff Instruction	Cut-off when revisions to data filing period is complete.
	Transfer to the National Archives for Accessioning	Transfer copy of the public use data with documentation to NARA annually in accordance with 36 CFR 1228.270.
	Additional Information	
	What will be the date span of the initial transfer of records to the National Archives?	From 2017 To 2017
	How frequently will your agency transfer these records to the National Archives?	Every 2 Years
1.3	Restricted Ultimate (TS and LAR) Data File.	
	Disposition Authority Number	DAA-0587-2019-0002-0003
	Final Disposition	Temporary
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Cutoff Instruction	Cut off when revisions to data are completed.

1.4	Retention Period	Retain for 5 years, then destroy or delete when no longer needed for reference or dissemination.
	Additional Information	
	GAO Approval	Not Required
	Restricted Final (TS and LAR) Data File.	
	Disposition Authority Number	DAA-0587-2019-0002-0004
	Final Disposition	Temporary
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Cutoff Instruction	Cut off when revisions to data filing period is complete.
	Retention Period	Retain for 5 years, then destroy or delete when no longer needed for reference or dissemination.
	Additional Information	
GAO Approval	Not Required	
1.5	Final Panel Data File.	
	Disposition Authority Number	DAA-0587-2019-0002-0005
	Final Disposition	Permanent
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes

1.6	Disposition Instruction	
	Cutoff Instruction	Cut off when revisions to data filing period is complete.
	Transfer to the National Archives for Accessioning	Transfer copy of the public use data with documentation to NARA annually in accordance with 36 CFR 1228.270.
	Additional Information	
	What will be the date span of the initial transfer of records to the National Archives?	From 2017 To 2017
	How frequently will your agency transfer these records to the National Archives?	Every 2 Years
	Ultimate Panel Data File.	
	Disposition Authority Number	DAA-0587-2019-0002-0006
	Final Disposition	Permanent
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
Cutoff Instruction	Cut-off when revisions to data are completed.	
Transfer to the National Archives for Accessioning	Transfer copy of the data with documentation to NARA annually in accordance with 36 C.F.R. 1228.270	
Additional Information		
What will be the date span of the initial transfer of records to the National Archives?	From 2017 To 2017	

	How frequently will your agency transfer these records to the National Archives?	Every 2 Years
2	Reports. The Bureau produces aggregate and disclosure reports from the final files that interpret HMDA data as follows.	
2.1	Aggregate Report.	
	Disposition Authority Number	DAA-0587-2019-0002-0007
	Final Disposition	Permanent
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Cutoff Instruction	Cut-off annually.
	Transfer to the National Archives for Accessioning	Transfer copy with documentation to NARA after cut off in accordance with 36 CFR 1228.270.
	Additional Information	
	What will be the date span of the initial transfer of records to the National Archives?	From 2017 To 2017
	How frequently will your agency transfer these records to the National Archives?	Every 1 Years
2.2	National Aggregate Report.	
	Disposition Authority Number	DAA-0587-2019-0002-0008
	Final Disposition	Permanent
	Item Status	Pending
	Is this item media neutral?	Yes

	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Cutoff Instruction	Cut-off annually.
	Transfer to the National Archives for Accessioning	Transfer copy with documentation to NARA annually in accordance with 36 CFR 1228.270.
	Additional Information	
	What will be the date span of the initial transfer of records to the National Archives?	From 2017 To 2017
	How frequently will your agency transfer these records to the National Archives?	Every 1 Years
2.3	Disclosure Statements.	
	Disposition Authority Number	DAA-0587-2019-0002-0009
	Final Disposition	Permanent
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Cutoff Instruction	Cut-off annually.
	Transfer to the National Archives for Accessioning	Transfer copy of the public use data with documentation to NARA annually in accordance with 36 CFR 1228.270.
	Additional Information	

2.4

What will be the date span of the initial transfer of records to the National Archives? From 2017 To 2017

How frequently will your agency transfer these records to the National Archives? Every 1 Years

Intermediate Files and Ad Hoc Files and Reports.

Disposition Authority Number DAA-0587-2019-0002-0010

Final Disposition Temporary

Item Status Pending

Is this item media neutral? Yes

Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? Yes

Do any of the records covered by this item exist as structured electronic data? Yes

Disposition Instruction

Retention Period Destroy or delete when no longer needed for reference or dissemination.

Additional Information

GAO Approval Not Required

3

Input Files.

Disposition Authority Number DAA-0587-2019-0002-0011

This item covers HMDA data submissions from lending institutions forwarded from oversight agencies to the Bureau. HMDA data are primarily sent electronically, although some paper forms are submitted occasionally. After the data are received by the Bureau, the data are extracted or manually entered into the HMDA system.

Final Disposition Temporary

Item Status Pending

Is this item media neutral? Yes

Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? Yes

4	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Retention Period	Destroy or delete after input data have been transferred to the master file and verified, or when no longer needed to reconstruct or backup the master file, whichever is later.
	Additional Information	
	GAO Approval	Not Required
	Documentation.	
	Disposition Authority Number	DAA-0587-2019-0002-0012
	Data systems specifications, file specifications, codebooks, record layouts, user guides, and output specifications (regardless of medium) relating to the master file, data, and electronic reports that have been scheduled as permanent in this disposition schedule.	
	Final Disposition	Permanent
	Item Status	Pending
	Is this item media neutral?	Yes
	Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
	Do any of the records covered by this item exist as structured electronic data?	Yes
	Disposition Instruction	
	Transfer to the National Archives for Accessioning	Transfer to NARA with the related master file, data, and/or electronic reports.
Additional Information		
What will be the date span of the initial transfer of records to the National Archives?	From 2017 To 2017	
How frequently will your agency transfer these records to the National Archives?	Every 1 Years	

Agency Certification

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal in this schedule are not now needed for the business of the agency or will not be needed after the retention periods specified.

Signatory Information

Date	Action	By	Title	Organization
01/08/2019	Certify	Steven Coney	Records Officer	Operations Division - Administrative Office

Executive Summary

Summary

Permanent Item Numbers 0001, 0002, 0005, 0006, 0007, 0008, 0009, 0012

Federal Register Notice

Publication Date

Copies Requested 0

Comments Received 0

The NMLSR, is a web-based system, that accepts, stores and provides reporting options on the registrations of MLOs who are employees of Agency-regulated institutions. The MLOs must register with NMLSR, creating a centralized repository of MLOs that are either federally registered or state licensed. As an integral part of the registration process the records created and received under the CFPB's Regulation G, the implementing rule for the SAFE Act, MLOs must furnish to NMLSR background information and fingerprints for a background check.

Item Count

Number of Total Disposition Items	Number of Permanent Disposition Items	Number of Temporary Disposition Items	Number of Withdrawn Disposition Items
1	0	1	0

GAO Approval

Outline of Records Schedule Items for DAA-0587-2021-0001

Sequence Number

1	Master File: Registration Data Disposition Authority Number: DAA-0587-2021-0001-0001
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Records Schedule Items

Sequence Number	
1	<p data-bbox="342 380 769 411">Master File: Registration Data</p> <p data-bbox="342 432 1149 464">Disposition Authority Number DAA-0587-2021-0001-0001</p> <p data-bbox="342 485 1518 978">Data elements in the NMLSR include, but are not limited to: Individual or Institution NMLSR User Account Base Record Data o Individual NMLSR User Account Base Record Data - consists of the assigned NMLS ID, Individual/MLO Name, SSN, DOB, email address, phone number) o Institution NMLSR User Account Base Record Data - consists of the assigned NMLS ID, Institution Name, IRS EIN, RSSD ID, Primary Federal Agency, Parent RSSD ID, email address, contact person name, phone number) # Registration Data – Data/information (excluding the Individual NMLSR User Account Base Record Data and the Institution User Account Base Record Data) collected for federal registration (includes all other data/information collected for federal registration—initial filing, amendments, business contact related information on non-MLO employees designated as an Institution primary contact and/or authorized to enter information into the NMLSR on behalf of the Institution, etc.)</p> <p data-bbox="342 999 919 1031">Final Disposition Temporary</p> <p data-bbox="342 1052 878 1083">Item Status Pending</p> <p data-bbox="342 1104 821 1136">Is this item media neutral? Yes</p> <p data-bbox="342 1157 805 1188">Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? No</p> <p data-bbox="342 1325 659 1356">Disposition Instruction</p> <p data-bbox="342 1377 813 1409">Transfer to Inactive Storage N/A</p> <p data-bbox="342 1430 1414 1545">Retention Period Destroy when an individual's or an institution's NMLS&R account status is inactive for five consecutive years</p> <p data-bbox="342 1587 659 1619">Additional Information</p> <p data-bbox="342 1640 951 1671">GAO Approval Not Required</p>

Agency Certification

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal in this schedule are not now needed for the business of the agency or will not be needed after the retention periods specified.

Signatory Information

Date	Action	By	Title	Organization
11/12/2020	Certify	Steven Coney	Records Officer	Operations Division - Administrative Office
12/03/2020	Return for Revision	Andreea Vlaicu	Archives Specialist	National Archives and Records Administration - Records Management Operations Appraisal Team 1
12/03/2020	Submit For Certification	Steven Coney	Records Officer	Operations Division - Administrative Office
12/03/2020	Certify	Steven Coney	Records Officer	Operations Division - Administrative Office

Executive Summary

Summary

Permanent Item Numbers

Federal Register Notice

Publication Date

Copies Requested 0

Comments Received 0

Request for Records Disposition Authority

Records Schedule Number DAA-0587-2021-0002
Schedule Status Proposed

Agency or Establishment Bureau of Consumer Financial Protection
Record Group / Scheduling Group Records of the Bureau of Consumer Financial Protection
Records Schedule applies to Agency-wide
Schedule Subject Consumer Response System 2.0
Internal agency concurrences will be provided No

Background Information Records created and received by this office relate to the mission-critical functions and the internal administration of the Bureau required for compliance with the governing principles of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010:

- 1) Consumers are protected from unfair, deceptive, or abusive acts and practices and from discrimination;
- 2) Federal consumer financial law is enforced consistently without regard to the status of a person as a depository institution; and
- 3) Markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.

One of CFPB's primary functions is to collect, assess and respond to consumer complaints regarding certain financial products and services. Currently, seven Federal agencies and numerous state agencies receive these complaints. The Dodd-Frank Act directs CFPB to facilitate the centralized collection, monitoring and response to these complaints. To support these mission-critical functions, the CFPB Office of Consumer Education and External Affairs, Office of Consumer Response (CR) creates and receives records and information in paper and electronic formats in the course of CFPB interaction with consumers of financial products and financial institutions.

Through CR, the CFPB receives and, as appropriate, responds to, routes, addresses, manages, and analyzes consumer contacts through a centralized system that integrates content of and communications with consumers, regulated entities and other government agencies.

CR receives consumer complaints and concerns by phone, fax, web portal, and surface mail, and captures the information in the Consumer Response System (CRS).

The Office of Consumer Response operates a Consumer Response System (CRS) which consists of a case management system, consumer call centers and online consumer web portals.

Through the CRS, the CFPB assigns a case number to each complaint and forwards complaints to the appropriate company for review and resolution via a company web portal. The company response is recorded in the CRS and provided to the consumer for review through a web portal, where the consumer has the option to dispute and comment on the resolution as reported by the company. The CRS captures of the consumer's response. Some complaints may warrant further evaluation by the CFPB, including potentially collecting additional information from the company or the consumer, and conducting additional analysis. The CFPB conducts trend and other analysis to determine if CFPB supervision or enforcement activities are warranted. The CFPB may transfer complaints to CFPB Supervision, Fair Lending, Enforcement and other offices within CFPB for additional review. The CFPB may also refer complaints to other federal or state agencies.

The CR maintains consumer contact centers, where consumers may call, fax or send mail regarding a complaint. The contact centers are operated under contract with a consultant, Maximus. Maximus maintains records of the contact centers and is governed by its contract with CFPB to appropriately create, manage and schedule records according to the CR records schedules.

The CR hosts several web portals where consumers may file a complaint, review company responses and respond to CR at predefined points of interaction in the CRS.

Item Count

Number of Total Disposition Items	Number of Permanent Disposition Items	Number of Temporary Disposition Items	Number of Withdrawn Disposition Items
4	1	3	0

GAO Approval

Outline of Records Schedule Items for DAA-0587-2021-0002

Sequence Number	
1	CFPB Consumer Response System (CRS) Master Files Disposition Authority Number: DAA-0587-2021-0002-0001
2	Tell Us Your Story Disposition Authority Number: DAA-0587-2021-0002-0002
3	Quality Control Records Disposition Authority Number: DAA-0587-2021-0002-0003
4	Outputs Disposition Authority Number: DAA-0587-2021-0002-0004

Records Schedule Items

Sequence Number	
1	<p data-bbox="345 380 1133 415">CFPB Consumer Response System (CRS) Master Files</p> <p data-bbox="345 432 1149 468">Disposition Authority Number DAA-0587-2021-0002-0001</p> <p data-bbox="345 489 1523 905"> Consumer Complaints: Data in the CRS is derived from scanned images of forms and correspondence, web intake forms, and electronic copies of responses, analysis, and other correspondence from companies and consumers. Data includes unique identifiers, codes, and descriptors categorizing each complaint or inquiry, as well as case numbers, name, address, account numbers (such as credit card and loan account numbers), Social Security Numbers (for credit reporting related complaints), company names and addresses, case resolution and investigation status, and case supervision and enforcement recommendation identifiers, among other identifiers. The CRS contains personally identifiable information (PII) and records in the CRS are subject to the Bureau's Privacy Policy, relating to PII. </p> <p data-bbox="345 926 915 961">Final Disposition Temporary</p> <p data-bbox="345 982 878 1018">Item Status Pending</p> <p data-bbox="345 1039 818 1075">Is this item media neutral? Yes</p> <p data-bbox="345 1096 818 1215">Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? Yes</p> <p data-bbox="345 1236 805 1325">Do any of the records covered by this item exist as structured electronic data? No</p> <p data-bbox="345 1360 659 1396">Disposition Instruction</p> <p data-bbox="345 1417 1523 1644"> Cutoff Instruction Cut off files at the end of each calendar year in which a consumer case file is closed. "Closed" is defined as a resolution of a consumer complaint and is also defined as the transfer of a case to the CFPB Office of Supervision and Enforcement for further financial institution supervision or enforcement action. </p> <p data-bbox="345 1665 1203 1701">Retention Period Destroy 25 year(s) after cut off.</p> <p data-bbox="345 1736 656 1772">Additional Information</p> <p data-bbox="345 1793 951 1829">GAO Approval Not Required</p>
2	<p data-bbox="345 1850 607 1885">Tell Us Your Story</p> <p data-bbox="345 1906 1154 1942">Disposition Authority Number DAA-0587-2021-0002-0002</p>

Data in the CRS is derived from on-line narratives completed by consumers, telling the CFPB about consumer financial issues and concerns. Unlike with the consumer complaint forms in the CRS, the consumer is not required to provide specific personally identifiable information) or specific financial information. The CFPB may use this feedback data for trend analysis, establishment of financial education materials, and for evaluation by the supervision and enforcement functions.

Final Disposition Temporary

Item Status Pending

Is this item media neutral? Yes

Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? Yes

Do any of the records covered by this item exist as structured electronic data? No

Disposition Instruction

Cutoff Instruction Cut off files at the end of each calendar year in which the "Story" was received.

Retention Period Destroy 15 year(s) after cut off.

Additional Information

GAO Approval Not Required

Quality Control Records

Disposition Authority Number DAA-0587-2021-0002-0003

Quality and consistency data that is based on CFPB analysis of CFPB responses to consumer complaints, response rates by CFPB to the consumer, response rates by financial institutions, as well as reporting and testing of staff and contractor performance. Data is used to identify improvements in written and verbal CFPB responses to consumers.

Final Disposition Temporary

Item Status Pending

Is this item media neutral? Yes

Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? Yes

3

4

Do any of the records covered by this item exist as structured electronic data?	No
Disposition Instruction	
Cutoff Instruction	Cut off files at the end of each calendar year in which the analysis was conducted.
Retention Period	Destroy 5 year(s) after cut off.
Additional Information	
GAO Approval	Not Required
Outputs	
Disposition Authority Number	DAA-0587-2021-0002-0004
<p>Reports, financial trend analysis, supervision and enforcement recommendations, and other records created to meet a specific mission-critical need of the CFPB. This item does not apply to routine system queries. Mission-critical reports, analysis, supervision and enforcement recommendations, and related mission-critical records.</p>	
Final Disposition	Permanent
Item Status	Pending
Is this item media neutral?	Yes
Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing?	Yes
Do any of the records covered by this item exist as structured electronic data?	No
Disposition Instruction	
If this item has multiple sections, indicate here records to which this section apply	Electronic Records
Cutoff Instruction	Cut off files at the end of each calendar year.
Transfer Electronic Records to the National Archives for Pre-Accessioning	Transfer electronic records to the National Archives for pre-accessioning 10 year(s) after Cutoff
Transfer to the National Archives for Accessioning	Transfer to the National Archives 15 year(s) after Cutoff
Additional Information	

First year of records accumulation **2012**

What will be the date span of the initial transfer of records to the National Archives? **From 2012 To 2016**

How frequently will your agency transfer these records to the National Archives? **Every 5 Years**

	Estimated Current Volume	Annual Accumulation
Electronic/Digital	250 GB	30 GB
Paper		
Microform		
Hardcopy or Analog Special Media		

Agency Certification

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal in this schedule are not now needed for the business of the agency or will not be needed after the retention periods specified.

Signatory Information

Date	Action	By	Title	Organization
02/10/2021	Certify	Steven Coney	Records Officer	Operations Division - Administrative Office

Executive Summary

Summary

Permanent Item Numbers 0004

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