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Disaster Response and Recovery Records

Multi-Agency Records Management Inspection Report

National Archives and Records Administration
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DISASTER RESPONSE AND RECOVERY RECORDS MULTI-AGENCY RECORDS MANAGEMENT INSPECTION

INSPECTION REPORT

INTRODUCTION

The National Archives and Records Administration (NARA) is responsible for assessing the proper management of records in all media within Federal agencies to protect rights, assure government accountability, and preserve and make available records of enduring value.¹ In this capacity, and based on authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906, NARA inspects the records management programs of agencies to ensure compliance with Federal statutes and regulations and to investigate specific issues or concerns. NARA then works with agencies to make improvements to their programs based on inspection findings and recommendations.

This report documents a multi-agency topical inspection of Disaster Response and Recovery (DRR) records. NARA selected these records due to their importance as evidence of Federal government activities in DRR incidents of increasing size, frequency, and cost. The inspection primarily focused on records that detail the Federal response and recovery mission areas as outlined in Presidential Policy Directive 8. According to this directive, response includes “the capabilities necessary to save lives, protect property and the environment, and meet basic human needs after an incident has occurred,” while recovery entails “the capabilities necessary to assist communities affected by an incident to recover effectively.”² Guidance for Federal agency activities in DRR mission areas is detailed in the National Response Framework (NRF)³ and the National Disaster Recovery Framework (NDRF).⁴ Developed by the Department of Homeland Security (DHS), the NRF and the NDRF assign Federal agencies coordinating or supporting roles in a declared disaster incident. Under the NRF, these roles are termed Emergency Support Functions (ESF), while under the NDRF, they are termed Recovery Support Functions (RSF).

To conduct the inspection, NARA selected several agencies with coordinating ESF and RSF roles as well as some with supporting roles to evaluate how well they comply with Federal records management (RM) statutes and regulations and to assess the effectiveness of their RM policies and procedures for the creation, use, and maintenance of DRR records.

The following seven agencies and offices were included in this inspection:

- Federal Emergency Management Agency (FEMA)-Office of Response and Recovery
- U.S. Army Corps of Engineers (USACE)-Emergency Management
- U.S. Forest Service (USFS)-State and Private Forestry, Fire and Aviation Management

¹ 44 U.S.C. Chapter 29, <https://www.archives.gov/about/laws/records-management.html>.

² <https://www.dhs.gov/presidential-policy-directive-8-national-preparedness>.

³ https://www.fema.gov/media-library-data/1572366339630-0e9278a0ede9ee129025182b4d0f818e/National_Response_Framework_4th_20191028.pdf.

⁴ https://www.fema.gov/media-library-data/1466014998123-4bec8550930f774269e0c5968b120ba2/National_Disaster_Recovery_Framework2nd.pdf.

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- Department of Housing and Urban Development (HUD)-Office of Disaster Management and National Security
 - Small Business Administration (SBA)-Office of Disaster Assistance
 - Department of Health and Human Services (HHS)-Office of the Assistant Secretary for Preparedness and Response
 - Department of the Interior (DOI)-Office of Emergency Management and Office of Environmental Policy Compliance

The scope of the inspection was limited to recordkeeping policies and practices within the DRR activities of these agencies and offices. It was not the intention of NARA to conduct a complete review of the RM programs of the agencies involved in the inspection. In particular, the inspection focused on the management of electronic records, including various forms of electronic communication, with emphasis on policies, training, and records schedule implementation of DRR records. All Federal agencies engaged in DRR activities should apply the findings and recommendations of this report to their RM and DRR programs to improve recordkeeping practices in DRR incidents.

Recommendations for increased coordination of activities among Federal agencies involved in DRR operations are included at the end of the report. Appendix A provides specific information for each of the seven agencies and offices in relation to the general findings and recommendations listed below.

FINDINGS AND RECOMMENDATIONS

The following findings and recommendations address the most pressing issues facing the management of DRR records, including some wider policy and procedural issues. All agencies involved in DRR are urged to undertake a holistic review of the relationship of RM to DRR programs to ensure the proper incorporation of agency RM policies, procedures, and practices into DRR operations.

PROGRAM MANAGEMENT REQUIREMENTS

Finding 1: Agency policies and procedures for the management of DRR records in incidents are in need of creation, review or revision.

While most agencies under review had general policies and procedures for RM, the application of these policies to DRR records varied greatly.

In general NARA found wide policy and procedural gaps between RM programs and DRR operations. There was little collaboration or cooperation between RM and DRR programs to ensure proper capture and control of records created during DRR incidents. Staff at two of the agencies interviewed questioned the need for active RM in DRR incidents, while several agencies were reviewing their recordkeeping practices for DRR incidents as a result of this inspection. Even those agencies with some policies or guidance in place for DRR had not updated them in some time or evaluated the effectiveness of agency records operations in an incident.

Policies and procedures for coordination between teams and offices in the field and RM staff in Headquarters (HQ), regional offices, and host units were also lacking. Agencies staff a wide variety of teams and offices in the field, such as Joint Field Offices (JFO), Recovery Field Offices (RFO), and Incident Management Teams (IMT) that collect and maintain records during the course of an incident. The relationship between these elements and RM staff should be well defined by policy and procedure to ensure the proper transfer of records from DRR incidents to the custody of RM program staff. NARA did not find such policies and procedures in place.

There were also gaps in overall RM program policies and procedures as they relate to DRR activities, such as:

- Policies for exit clearances for temporary and other staff hired for incident response and recovery;
- Protections against unauthorized disposition of records and disposal of contaminated records;
- Policies for the inclusion of Federal records and data ownership language in contracts for services for DRR incidents; and
- Procedures for conducting RM evaluations of offices and programs engaged in DRR activities.

Without clear policies, procedures, and guidance about all aspects of RM responsibilities and requirements in a DRR incident, consistent documentation and accountability of Federal agency activities is not possible.

Recommendation 1: Agencies must update or create policies and procedures for offices, programs, and personnel engaged in DRR incident activities to ensure that records are being captured, maintained, transferred, and dispositioned according to agency and Federal RM requirements. (36 CFR 1220.34(c), 1222.24, and 1222.26(e))

Finding 2: Agencies do not consistently assign RM responsibilities to staff involved in DRR incidents and do not consistently assign RM staff to offices responsible for the receipt and maintenance of records after an incident.

The inadequate assignment of staff with RM training to DRR incidents is a pressing concern. None of the agencies inspected have established and communicated clear roles and requirements for personnel trained in RM to be assigned to a DRR incident. Most agency DRR programs utilize the Incident Command System (ICS) as outlined in the National Incident Management System (NIMS). The ICS includes the incorporation of a *Documentation Unit Leader (DOCL)* position into DRR activities. This position is responsible for document control and management in an incident, but usually is not integrated into agency RM procedures. The DOCL is required by some agencies if an ICS is established for a disaster, but even within FEMA, the position can be filled on an *ad hoc* basis or go unfilled depending on the type of incident and budgetary restrictions.

In the absence of an assigned DOCL, the Planning Section Chief or Incident Commander is responsible for documentation activities in a DRR event, but given the breadth of duties assigned to a Chief or Commander during an incident, it is unlikely that these activities are being carried

out effectively unless they are delegated to other incident personnel. Limited evidence of this type of delegation was provided to NARA during the course of the inspection. Finally, there is very little integration of the activities of the DOCLs, or other such incident personnel, with RM staff in HQs, regional offices or host units.

Currently, the primary means for the integration of RM staff into the DRR activities is the assignment of Records Managers, Records Liaisons (RL), and Records Custodians or Coordinators (RC) to programs engaged in DRR operations. These RM staff members should be closely integrated into DRR operations to ensure that they are aware of all aspects of records operations in an incident from staff deployments, to document retirements, to the final closeout of an incident. Trained records personnel are required to review documentation arriving from the field to ensure that it has been captured accurately and according to agency schedules. RM personnel must be integrated into DRR operations to track changes in records creation and capture in DRR incidents, and to make programmatic changes as needed to RM practices and procedures in this key area.

Agencies should make concerted efforts to ensure that trained RM staff are present in DRR incidents and to fully staff RM programs associated with DRR programs. In several instances, RM personnel such as RLs and RCs were not assigned to programs engaged in DRR activities in accordance with agency policies.

Recommendation 2.1: Agencies must assign RM staff to offices and programs involved in DRR activities according to policies. (36 CFR 1220.34(a))

Recommendation 2.2: Agency RM programs must develop guidance for roles and responsibilities specific to the RM responsibilities of all staff engaged in DRR activities. (36 CFR 1220.34(d))

Finding 3: Staff assigned to DRR incidents did not have agency-specific RM training and guidance for the handling of Federal records.

The assignment of trained records personnel in DRR incidents did not occur in a consistent manner among the inspected agencies, while those agencies that did assign personnel to RM duties did not consistently provide agency-specific training for the handling of incident records.

Currently within NIMS, FEMA has guidance and qualification requirements for DOCLs that can be ordered by agencies as a resource within the Web Emergency Operations Center (WebEOC) system for a DRR incident. Personnel performing this function must complete National Qualification System (NQS) training requirements outlined in a Position Task Book (PTB) that provides guidance for recordkeeping activities in an incident.

The NQS PTB serves as a general training tool for personnel who want to certify as a DOCL assigned to DRR incidents. Adopted for use by other Federal agencies, DOCL training is an overview of the responsibilities of this position from the initial establishment of a JFO to preparation of records for the final closeout of the incident and the transfer of records to the Authority Having Jurisdiction (AHJ). The process should be the same for establishment and demobilization of RFOs, IMTs, Incident Support Teams (IST) and other operational elements in use by agencies during a DRR incident.

While the use of the PTB format for records training is adequate, it should be supplemented with training that addresses agency-specific RM requirements for staff assigned to a DRR incident. Among the agencies interviewed, only the USFS had specific training for personnel assigned to DRR incidents. This training, job aid J-342, *Documentation Unit Leader*, was developed by the National Wildfire Coordinating Group (NWCG), but is not required to qualify for the DOCL position.⁵ The training provides an overview of DOCL activities in a fire incident and is supplemented by information on the NWCG website regarding the collection, maintenance, and disposition of records by IMTs. Interviews with USFS Regional Staff indicated that most DOCL training was “hands-on” in fire incidents.

For all other agencies interviewed, RM training specific to the responsibilities and duties of staff assigned to DRR incidents was inadequate to non-existent. There is a need for tiered, role-based RM training for staff engaged in DRR incident activities (e.g., for records creators and staff transferring records to the AHJ and HQ, regional or host unit RM staff). All personnel participating in DRR operations should have some level of training regarding the importance of proper RM in an incident, while personnel responsible for handling documents during the course of an incident should receive RM training specific to the needs and requirements of their agency.

Recommendation 3.1: Agency RM policies and procedures must require appropriate levels of RM training for all staff assigned to DRR incidents. (36 CFR 1220.34(d) and NARA Bulletin 2017-01)

Recommendation 3.2: Agencies must review, update, or create RM training for staff handling documents and records of DRR incidents. (36 CFR 1220.34(d) and NARA Bulletin 2017-01)

Recommendation 3.3: Agencies utilizing the NIMS ICS DOCL position must review and update their job aids or instructions to ensure that agency-specific records handling and transfer instructions are included in the training requirements. (36 CFR 1220.34(d))

RECORDS SCHEDULING REQUIREMENTS

Finding 4: Records schedules for DRR records are outdated, and retention periods vary between agencies for the same or similar records.

The creation of records in a DRR incident is a dynamic activity. Changes in the types of records created and the way they are handled in an incident happen at a rapid pace. NARA reviews of agency records schedules found that they are not staying abreast with the changing nature of DRR work. As a result, many agency schedules associated with DRR activities are outdated and require review and revision.

All agencies inspected must review and revise their current schedules for DRR records in both paper and electronic formats. A review of agency records schedules that address DRR incidents revealed that many are old, with some dating back to the 1970s. DRR schedules do not address records that may be created in multiple formats or that have changed from paper to electronic

⁵ <https://www.nwcg.gov/sites/default/files/products/training-products/J-342.pdf>.

formats. This was particularly true of FEMA, HUD, SBA, and USACE, where old schedules from the 1970s to 1990s are still in use. There are record series, types, and formats that have been introduced over the past 30 years that need to be accounted for by more current records schedules.

There were also wide differences in agency retention periods for records of the same DRR incident. The disposition instructions for the transfer of permanent DRR records to NARA, among agencies inspected, ranged from 5 years to 30 years after file closure, and those for temporary DRR records ranged anywhere from 2 years to 75 years. There is a need for varying records retention depending on agency activities during DRR incidents. Agencies also need different retention periods for records due to business and legal requirements after an incident. However, coordination to develop common retention periods and disposition instructions for DRR records would improve accountability for Federal activities in a DRR incident. It would also increase public access to incident records and the consistent transfer of permanent DRR records to NARA.

Another pressing issue is the need for agencies to review and revise the instructions for the implementation of their schedules to ensure staff capture and maintain the appropriate documentation of an incident. Several agencies have created schedules that designate some records of significant DRR incidents as permanent and all others as temporary. In most cases, clear instructions for the implementation of these schedules and the separation of permanent and temporary records series by staff engaged in DRR activities or DRR RM program staff after an incident was not provided in agency policy or procedures.

Recommendation 4.1: All agencies must review and create or update, where needed, existing records retention schedules for DRR records. (36 CFR 1220.34(g))

Recommendation 4.2: Agencies utilizing DRR schedules that call for the selection of permanent incident records must clearly define selection criteria and procedures for these incidents. (36 CFR 1222.34)

Recommendation 4.3: Agency RM programs must develop internal controls to review the implementation of approved schedules in coordination with programs engaged in DRR activities, and to ensure that adequate documentation of incidents is being captured and maintained according to agency legal and business requirements or national interest. (36 CFR 1220.30(c)(1) and 1220.34(i))

ELECTRONIC RECORDS MANAGEMENT REQUIREMENTS

Federal agencies engaged in DRR activities use a wide variety of electronic workflows and electronic information systems (EIS) during DRR incidents. There are incident management systems, loan systems, grant systems, and specialized systems such as emPOWER, which is used by HHS/Assistant Secretary for Preparedness and Response (ASPR) to track health populations placed at risk by the loss of electrical power in disasters. Agencies involved in DRR activities are currently working to increase the interoperability and interconnectivity of electronic workflows and EIS. In most cases, NARA did not find RM integrated with the development and scheduling of EIS, applications and workflows used for DRR activities.

Finding 5: Records schedules for EIS associated with DRR do not exist or are outdated, which inhibits recordkeeping and the integration of preservation requirements into the design, development, implementation, and enhancement of DRR EIS.

All agencies reviewed by NARA are using and developing EIS and applications on a continuing basis to handle the increasing complexity of DRR incidents. It was found that agency RM programs were not involved in the development of these systems in accordance with 36 CFR 1236.6(b).

The integration of RM with the Office of the Chief Information Officer (OCIO) or IT programs involved in DRR EIS development is critical to the proper scheduling of systems and the data they contain. Interviews with several agencies found that RM programs did not participate in EIS development at the outset of projects and were sometimes not informed of system requirements until the end of the development process, if they were informed at all. This lack of coordination has a direct impact on the ability of agency RM programs to schedule systems and participate in DRR EIS migrations and decommissioning actions.

A review of approved records schedules among the agencies inspected by NARA found that only the USFS developed schedules to specifically address all EIS and applications associated with DRR incidents. Some agencies have scheduled individual DRR systems, while others are in various stages of the scheduling process or have not scheduled EIS at all. Most agencies did not have up-to-date inventories of their DRR EIS, nor were they working on the creation of new inventories.

The failure to inventory and schedule DRR EIS places these agencies at risk of losing data and information of importance to the Federal government and those members of the public impacted by DRR incidents. Additionally, this failure hinders the ability of these agencies to meet the requirements of the Office of Management and Budget (OMB)/NARA *Transition to Electronic Records* (M-19-21), target 1.4,⁶ which states that all records created or maintained by the agency must be covered by a NARA-approved records schedule, and that agencies must ensure that existing records schedules are updated as business practices transition to electronic workflows.

Recommendation 5.1: Agency RM programs must be integrated into the development lifecycle of DRR EIS and applications through policy and procedure in accordance with Federal regulations. (36 CFR 1236.6(b))

Recommendation 5.2: By policy and procedure, agency RM programs must conduct regular inventories of DRR EIS. (36 CFR 1236.26(a))

Recommendation 5.3: Agencies with unscheduled DRR EIS must develop a plan to schedule the systems. (36 CFR 1220.34(g))

Finding 6: Agencies did not have intellectual control of analog and unstructured electronic DRR records, both during and after DRR incidents.

⁶ <https://www.whitehouse.gov/wp-content/uploads/2019/06/M-19-21.pdf>.

Agencies engaged in DRR activities are maintaining records, but most do not organize them and manage them according to Federal regulations to ensure availability to authorized personnel, to minimize risk of unauthorized disposal, or to facilitate their eventual disposal or transfer to NARA. The effective tracking and control of records created during a DRR incident is essential to the accurate documentation of agency activities during the course of a crisis. Effective agency procedures for collecting, filing, and controlling records after a DRR incident are essential for agency RM programs to retain intellectual control of records once they are returned to HQ, regional offices or host units from disaster sites.

Records returned from DRR operations are voluminous, often duplicated, and can be maintained in numerous formats. All agencies inspected maintain DRR incident records in a variety of media, in a number of locations, in both analog and electronic formats. Records are stored on official drives, shared drives, and Microsoft Sharepoint sites. In some cases, records have been stored on these drives for decades without the application of disposition or measures to ensure access to older information. In other cases, records are still stored in paper format in warehouses or on pallet storage.

In all offices and programs, the transition to cloud-based shared access services that host original and duplicate copies of records is becoming common. RM staff at nearly all agencies reported difficulties maintaining inventories of DRR records, tracking them for Freedom of Information Act (FOIA) requests and legal needs, and applying dispositions to records. Three of the agencies inspected had efforts underway to implement electronic records management systems (ERMS), but they are still in the development phase.

With so many records storage mechanisms available and in use, it is vital that agencies maintain accurate file plans and inventories of files to find records when needed and properly disposition records associated with DRR activities. Upon review, however, it was found that inventories of DRR records at the agencies inspected were not maintained on a consistent basis and could not be produced by several of the offices and programs.

The lack of intellectual control contributes to the tendency for agencies to maintain DRR records beyond the retention periods of NARA-approved records schedules, delaying the disposal of temporary records according to these schedules. In addition, it has a direct impact on the ability of agencies to identify and transfer permanent records to NARA when not stored in a Federal Records Center.

Recommendation 6.1: Agency RM programs must establish policies and procedures for establishing and maintaining the intellectual control of DRR records. (36 CFR 1222)

Recommendation 6.2: Agencies must update file plans and inventories for DRR records in all formats. (36 CFR 1222)

Recommendation 6.3: Agencies must apply dispositions to DRR records in accordance with NARA-approved records schedules. (36 CFR 1226)

Finding 7: There is a lack of clearly defined procedures to capture records created by the widespread use of government and personally-owned mobile devices or social media platforms in a DRR incident.

During a DRR incident, for efficiency or convenience, and often by necessity, a wide variety of mobile devices including cell phones, laptops and tablets are used by staff in the field. In some cases, these devices are personally-owned. Agencies use these devices and other social media applications to communicate with each other, with local government responders, and the public.

Agencies are responsible for managing Federal records created by text messages, encrypted communications, messaging applications, and direct messages on social media platforms. Social media content and electronic messages related to the conduct of agency business, in this case emergency response and recovery efforts, are presumed to be Federal records. To assist agencies, NARA has guidance for managing electronic communications and social media in NARA Bulletin 2014-02 and NARA Bulletin 2015-02.⁷

The agencies involved in this inspection have general RM policies regarding email use and, in some cases, the use of personal devices and social media platforms. Most include requirements to capture government information in an appropriate agency recordkeeping system. Some agencies had procedures for capturing information from government-owned devices in DRR incidents, but this was on a local basis and not uniformly applied across the agency. DRR procedures only covered the use of mobile devices, but did not incorporate information or instructions regarding records stored on these devices or the recovery of potential Federal records. This is particularly important when the Federal records have been created on personal devices. Instructions regarding the use of social media platforms and capture of records from platforms in a DRR incident were not found in the agencies inspected.

Recommendation 7. Policies that cover the use of mobile devices and social media platforms during DRR incidents must include instructions for ensuring records created and maintained on these devices and platforms are transferred to agency recordkeeping systems. (Public Law: 113-187, 36 CFR 1222.24 and 36 CFR 1236.22)

RECORDS CONSIDERATIONS FOR THE FEDERAL DRR COMMUNITY

Under both the NRF and the NDRF, FEMA serves as the coordinating agency for Federal DRR activities in major incidents and assigns tasks to agencies through vehicles such as the NIMS. However, there is no coordinating agency for RM activities in these incidents, nor is there an overarching Federal DRR incident policy or guidance that ensures that records are being properly captured and maintained by Federal agencies involved in DRR activities. As a result, records captured during a DRR incident can differ among the numerous agencies involved in an incident and can be held under various dispositions and retention periods. This negatively impacts public access to DRR incident records, records retention, and the transfer of permanent incident records to NARA. While there are legal, business, and statutory needs that require agencies to maintain records for their own purposes, there is also a need for coordination of RM policies and procedures regarding DRR records under the leadership of a single department or agency, or a consortium of agencies, that can work to share best practices or resolve common issues that arise with DRR records. The USFS already participates in the NWCG, which has developed interagency records schedules, guidance, and training. The establishment of such a

⁷ NARA Bulletins can be located at <https://www.archives.gov/records-mgmt/bulletins>.

group among all Federal agencies participating in DRR operations should be considered as a best practice.

While NARA cannot make formal recommendations that the agencies involved in NRF and NDRF activities create such a consortium, we do make the following suggestions for agencies that have a role in DRR operations to consider:

1. At a minimum, a coordinating agency should be assigned within the NRF and the NDRF to oversee and review Federal RM activities in DRR incidents and to incorporate RM into DRR guidance, such as NIMS.
2. As the coordinating agency for Federal DRR activities, FEMA should take the initial step to develop an interagency consortium to discuss RM requirements for DRR records.
3. A consortium of departments and agencies engaged in DRR activities should review current incident schedules to determine areas of similarity and arrive at common dispositions and retention periods for these records, wherever possible.
4. NARA will explore the development of a common or General Records Schedule for DRR incident records.

CONCLUSION

In FY 2018, there were 124 declared disasters and 61 major disaster declarations within the United States and its territories. Fourteen of these disasters entailed expenses of over one billion dollars. Wildfires alone cost 24 billion dollars, killed over 100 people and destroyed over 18,500 homes. The National Oceanographic and Atmospheric Administration (NOAA) estimates that the cost of all disaster activities in 2018 was over 91 billion dollars.⁸

The growing frequency and magnitude of disasters makes it imperative that the Federal government fully document its activities during the course of an incident and afterwards. The loss of lives, the destruction of property, the cost of resources and the mobilization of increasing numbers of personnel and their deployment to hazardous situations has made accurate recordkeeping in these incidents of vital importance to the Federal government. The importance of these records to documenting Federal agency activities during and after a DRR incident to protect the rights of employees and citizens cannot be overstated.

While this report focused solely on DRR records, the conditions surrounding the management of these records should not be reviewed in a vacuum. Maintaining current policies and procedures, records schedules, records inventories, implementing dispositions, and the inclusion of recordkeeping requirements in EIS, are all part of an agency's RM program as required by 36 CFR Chapter XII, Subpart B. The protection of DRR records, both during and after a DRR incident, must be included in the overall RM program of the seven agencies reviewed as part of this inspection, as well as all agencies with a role in DRR throughout the Federal government.

⁸ <https://www.climate.gov/news-features/blogs/beyond-data/2018s-billion-dollar-disasters-context>.

By implementing the recommendations made in this report, these agencies will improve not only their DRR recordkeeping practices, but also their overall RM programs.

APPENDIX A

OVERVIEW AND RESULTS FOR EACH INSPECTED AGENCY

NARA is providing feedback as a tool for agencies to focus on how the consolidated findings and recommendations documented in the report relate to each respective organization. NARA also has provided specific tactical areas of improvement for each agency. Agencies should view these as a starting point and not all-inclusive for improving respective RM components and processes.

FEDERAL EMERGENCY MANAGEMENT AGENCY

Applicable Findings and Recommendations: 1, 2, 3, 4, 5, 6, 7

Role in Disaster Response and Recovery - FEMA is the lead agency in Federal disaster response and recovery activities. Utilizing NIMS and WebEOC, FEMA makes assignments to agencies designated for activities within ESF and RSF. FEMA is the primary agency for ESF-6, which involves the coordination of mass care and emergency assistance.

RM Program Overview - The RM Program at FEMA currently falls under the Office of the Chief Administrative Officer. The program is staffed by an Agency Records Officer (ARO) who also has oversight of the FOIA, Privacy, and Paperwork Reduction Act programs. Currently, there are two staff members assigned to the RM program at HQ with a network of Record Liaison Officers (RLO) in FEMA regional offices, as well as RCs assigned to individual offices.

Finding 1: Policy and Procedure Requirements - FEMA agency RM policies are being updated. A report by the ARO in late 2018 detailing shortfalls in mission support requirements for RM in DRR incidents recommended that FEMA develop clear policies that outlined roles and responsibilities for RM to personnel assigned to JFOs in an incident. The 2017 FEMA *Incident Management Handbook* (FEMA B-761) identifies personnel assigned to records activities in the field, but does not provide detailed guidance about how this work is to be done or what records are to be captured in an incident. A collaborative effort between RM and the Office of Response and Recovery is underway to develop RM guidance for staff engaged in DRR activities. The completion and acceptance of this policy would help FEMA address issues noted in Finding 1. *(Agency must address recommendation 1)*

Finding 2: RM Staffing - The field RM guidance currently being developed by FEMA addresses DRR incident staffing issues and establishes collaboration between the Planning Cadre Management staff within the Office of Response and Recovery and the Records Management Branch. Once approved, the review cycle for this guidance should be strictly followed to stay abreast of RM staffing needs and requirements. Conversely, FEMA needs to address the integration of agency RLOs and RCs involved with Response and Recovery operations into DRR incident activities and work to ensure continuity in these positions as much as possible. It was noted that there is a high degree of turnover in the RLO and RC positions, as well as a lack of clear direction about roles and responsibilities. *(Agency must address recommendations 2.1 and 2.2)*

Finding 3: Records Management Training - FEMA has guidance and qualifications for DOCLs (designated as Planning Cadre DOCLs); however, this training does not specifically address agency RM guidelines or procedures. RM staff receiving records do not receive specific training regarding the handling of DRR records. Agency training for all personnel assigned to DRR activities should receive a RM program review that addresses their records responsibilities in an incident. *(Agency must address recommendations 3.1, 3.2, and 3.3)*

Finding 4: Records Scheduling - FEMA's records schedule specifically covering disaster assistance program records has not been updated since 1986. Having a schedule this old does not address structural and functional changes within the agency. Another records schedule, created in 2004, covering significant domestic catastrophic events, provides categories for the creation of Special Records Collections (SRC) based on types of events. This schedule is now over ten years old and lacks clarity for distinguishing between permanent and temporary records. The FEMA RM Manual, FM-141-1, does provide some guidance for SRC and other incident records, but lacks direction on how or when records are declared as SRC and how to distinguish between permanent and temporary records regardless of an SRC declaration. These ambiguities have led to the incorrect implementation of the schedule. This was the case at FEMA Region IV where permanent DRR records were being filed as an administrative schedule item under program correspondence files or program management functions instead of disaster incident records. The FEMA ARO indicated that he was reviewing the current records schedules and the FEMA RM Manual, along with other policies and guidance, with the intention of updating and providing clearer schedule guidance. *(Agency must address recommendations 4.1, 4.2, and 4.3)*

Finding 5: Electronic Records Management - IT management issues at FEMA are of a long-standing nature and were the subject of a DHS Office of Inspector General (OIG) report that recommended the OCIO strengthen Information Technology (IT) governance across the agency.⁹ As a result, the FEMA OCIO agreed to increased oversight and management of the development of EIS. The FEMA RM program should be integrated into these oversight activities and should be included in plans to establish an IT governance board.

Additionally, FEMA has numerous EIS that have not been scheduled to date. Among these are tasking and financial tracking systems, such as the Enterprise Coordination and Approvals Processing System (eCAPS); the National Emergency Management Information System (NEMIS); the WebEOC, the Web Integrated Financial Management Information System (WebIFMIS); and grant systems, such as Emergency Management Mission Integrated Environment (EMMIE); just to name a few. Information from four systems, including EMMIE, is gathered and stored in a Document Management and Records Tracking System, which is not scheduled. The FEMA RM program must prioritize the inventorying and scheduling of EIS and applications throughout the agency. *(Agency must address recommendations 5.1, 5.2, and 5.3)*

Finding 6: Intellectual Control of Records - FEMA DRR records are maintained in a wide variety of locations and in a number of formats. Many records are duplicated. For example, FEMA Region IV digitized a large volume of files from hurricane incidents only to determine that they still need to maintain the paper copies of the records due to access issues with the

⁹ <https://www.oig.dhs.gov/sites/default/files/assets/2019-08/OIG-19-58-Aug19.pdf>.

digital copies. In Region VI, the storage of paper files has been reduced through digitization; however, staff continue to rely on paper copies to locate information quickly. The one area that was well maintained in both regions visited were the recovery case files. These files are in active use.

FEMA is currently drafting new field RM guidance that will help in this area. The field RM guidance under development addresses the capture and control of records in a DRR incident. In order to be successful, FEMA RM staff should work closely with Planning Cadre Management staff to assess the best methods to establish intellectual control of records during DRR incidents. There are also challenges once the JFO transfers records to regional locations, or when records are handled after an incident is over, but the case files continue to be created or needed. At both FEMA Region IV and VI, there was no consistency or common practices. There were no inventories of records at either region.

In association with its work on DRR schedules and EIS schedules, FEMA should prioritize the inventory of DRR records at both HQ and regional offices in order to identify obsolete, duplicate, and unscheduled records. (*Agency must address recommendations 6.1, 6.2, and 6.3*)

Finding 7: Use of Mobile Devices and Social Media Platforms - Other than policies for issuance of property, there was no evidence of procedures to capture Federal records from government or personally-owned mobile devices. FEMA has social media policies in place, but these should be incorporated into DRR activities along with guidance on mobile devices. These policies should be included in the new field RM guidance currently in development. (*Agency must address recommendation 7*)

U. S. ARMY CORPS OF ENGINEERS

Applicable Findings and Recommendations: 1, 2, 3, 4, 5, 6, 7

Role in Disaster Response and Recovery - USACE has responsibility for ESF-3, public works and engineering, and RSF-5 infrastructure systems. Under its ESF-3 responsibilities, USACE must protect, repair, and reestablish critical infrastructure components, and provide engineering services and construction management. Within the RSF, USACE works to support infrastructure restoration and facilitate preparedness for future incidents.

RM Program Overview - The USACE RM program falls under the Office of the Chief Information Officer (CIO/G-6). The program is under the direction of a Program Manager, who is designated as the ARO. The ARO is assisted by a RM Branch Chief and two Regional Records Managers from the Enterprise Records Management Team. In line with Department of the Army regulations, the USACE RM program utilizes a structure of Record Managers and RCs at the Division and District level to manage the RM program. Typically, the USACE RM program follows Army RM guidance as a Direct Reporting Unit, but can have separate regulations due to the unique mission of USACE.

Currently, the USACE RM program is undergoing several initiatives to more closely align its policies and procedures with those of the Army RM program, such as the utilization of the Army Records and Information Management System (ARIMS) throughout the Corps. Agency support for the USACE RM program is needed to help ensure the success of these initiatives.

Finding 1: Policy and Procedure Requirements - Engineering Regulation 500-1-1, *Civil Emergency Management Program*, has not been updated since 2001 and does not include RM information. The USACE RM Program has drafted a Standard Operating Procedure (SOP) for use in DRR incidents, but it is still in development. USACE RM should coordinate efforts with USACE Emergency Management (EM) elements to ensure the incorporation of RM requirements into future regulations. ***(Agency must address recommendation 1)***

Finding 2: RM Staffing - Engineering Regulation 25-60-1, *Records Management Program*, requires that a Records Manager be appointed at every Division, District, Center and Forward Operating Area. In addition, a RC is to be appointed in writing for all offices within the same organizational elements. At USACE South Atlantic Division, a single Records Manager was assigned to cover the Division and the Mobile District simultaneously, while RCs did not appear to be appointed to the EM offices interviewed by NARA. The situation was similar at USACE Southwest Division where the Records Manager was also responsible for records duties at the Fort Worth District as well as serving as the RC for EM. At the Galveston District, the Records Manager participated in DRR activities on emergency response teams as a RC, but the District did not have a full complement of RCs. To ensure the better integration of RM into DRR operations, USACE should staff its RM program according to Engineering Regulation 25-60-1 and pertinent Army Regulations. ***(Agency must address recommendations 2.1 and 2.2)***

Finding 3: Records Management Training - USACE has no specific RM training for personnel assigned to DRR incidents. Engineering Regulation 500-1-28, *National Response Planning Guide*, dated 31 January 2001, designates an Enterprise Emergency Response Team as part of an Information Management Cadre deployed to a DRR incident. Members of this team are supposed to have records management experience. USACE reported that assignments of personnel trained in RM to JFOs and RFOs were inconsistent. The draft USACE SOP for managing records during a natural disaster should address RM staffing requirements and training in a DRR incident. ***(Agency must address recommendations 3.1 and 3.2)***

Finding 4: Records Scheduling - USACE operates under Army records schedules and utilizes ARIMS to apply retentions and dispositions to records. The Army does not have a specific schedule dedicated to DRR records. A schedule for “post response” activities was approved in 1984. Other DRR activities appear to fall under emergency reporting and mission schedules from the 1970s. All of these schedules deal with reporting activities and do little to define the actual documentation required to be maintained on a temporary or permanent basis by USACE in DRR incidents. A scheduling initiative is being planned by the USACE and Army AROs. ***(Agency must address recommendations 4.1 and 4.3)***

Finding 5: Electronic Records Management - The Department of the Army issued updated regulations on IT on 15 July 2019. Army Regulation 25-1 clarifies Army IT policy and designates RM as one of the initial milestones of EIS development. Currently, the USACE RO is not involved in EIS development and must be integrated in the process, according to Engineering and Army Regulations, to appropriately secure, maintain, and preserve records throughout their lifecycle.

USACE does not have a comprehensive inventory of EIS in use in DRR incidents. There are

numerous systems in use that need to be reviewed and scheduled, if necessary, by the RM program. Among these systems are the USACE Common Operating Picture (uCOP) and the mission tracking system ENGLink. There are also applications such as Mobile Information Collection Applications for the Blue Roof and Flood Relief programs. USACE also utilizes EIS provided under contract by private vendors such as the Automated Debris Management System, which is used to track debris removal in disaster areas. Such contracts should be reviewed to ensure that Federal data and records requirements are fulfilled in the agreement. The USACE RM program must prioritize the inventorying and scheduling of EIS and applications throughout the agency. (*Agency must address recommendations 5.1, 5.2, and 5.3*)

Finding 6: Intellectual Control of Records - Management of records in a DRR incident was not clear, and guidance is of a very limited nature. In one instance, the USACE incident commander at a RFO in Puerto Rico worked with his local General Counsel to develop RM procedures and checklists for use in the field due to a lack of guidance from the agency. The draft USACE SOP for managing records during a natural disaster should address RM records control in a DRR incident.

USACE did not provide inventories of existing DRR incident files but is currently in the process of a formal transition from an agency specific electronic document records management system to the use of ARIMS, and is actively updating file plans for all agency records. Completion of this work for units engaged in DRR activities would help USACE complete the recommendations made in Finding 6. (*Agency must address recommendations 6.1, 6.2, and 6.3*)

Finding 7: Use of Mobile Devices and Social Media Platforms - Other than policies for issuance of property there was no evidence of procedures to capture Federal records from government owned or personally owned mobile devices. The USACE in Mobile and Ft. Worth captured hard drives and government cell phones on return from field use; there was some evidence of this in Galveston as well. The USACE ARO is developing policies to address this issue and should include social media capture policies as well in any agency guidance. (*Agency must address recommendation 7*)

U.S. FOREST SERVICE

Applicable Findings and Recommendations: 1, 2, 3, 4, 5, 6, 7

Role in Disaster Recovery and Response - USFS is the lead agency for ESF-4 and supports all phases of wildland, rural, and urban firefighting operations in a major incident. In some instances, the President can declare a fire as a major disaster, as in the case of the California wildfires of 2018. Typically, FEMA issues Fire Management Assistance Declarations (FMADs) for many wildfires. Under a FMAD, the Forest Service can provide assistance to local and state entities to engage in or support fire suppression operations on public or private lands. Finally, USFS is responsible for wildfire suppression within the National Forest System and supports the suppression activities of other Federal agencies on their lands.

RM Program Overview - The USFS RM program is aligned under the Office of Regulatory Management Services (ORMS). The RM program is overseen by an ARO who has responsibility

for the creation of policies and procedures for the agency in association with the Director of ORMS. The ARO is assisted by a network of Records Managers and RLs, both at HQ and USFS Regions.

Finding 1: Policy and Procedure Requirements - As part of the NWCG, USFS has participated, since 2005, in the issuance of detailed interagency guidance for managing records in a wildland fire incident. This latest iteration of this guidance was posted to the NWCG website in July 2019. Other publications, such as the National Interagency Fire Center's (NIFC) *Interagency Standards for Fire and Fire Aviation Operations* or *Redbook*, should include more substantive RM information. USFS also has a *Reference Guide* for ESF-4 incidents which provides some information regarding the collection of records into a "closeout package." This publication should include more guidance on RM in ESF-4 activities. USFS should review agency guidance to ensure that the RM is represented in all DRR policies and procedures. ***(Agency must address recommendation 1)***

Finding 2: RM Staffing - In fire incidents, DOCLs can be assigned to an IMT to handle RM duties, but this is not a required position on the team. According to staff at USFS Region 5, the DOCL position has not been filled consistently in recent years due to budget constraints and staffing shortages in incidents. This lack of consistency means that Forests may or may not receive fire incident records that have been filed according to NWCG standards and guidance. Without proper staffing in a fire incident, it is difficult to ensure the quality and integrity of documents being transferred to the custody of individual Forests from the field.

Compounding the difficulty of records transfers from fire incidents was the lack of RM staffing in Host Units such as Forests. USFS Manual, 6230.4, *Records Management Program*, requires the appointment of Records Managers in Field Service Units who have oversight of the RM program in their units such as regional HQs. Records Managers also oversee the activities of RLs on National Forests and Ranger Districts. RLs appointed to these units are responsible for maintenance of file plans and inventories for their units. The USFS Region 5 Records Manager stated that the region required 34 RLs, but that at least half of the positions were vacant. For instance, there was no assigned RL at the Northern California Geographic Area Coordination Center forcing the Center Manager to conduct a records inventory for litigation hold purposes. At Mendocino National Forest, the RL position had been vacant for 4 years and the Forest Administrative Officer had assumed records duties along with her other assignments. The USFS RM program should staff the RM program in accordance with USFS Records Manual 6230.4 or review the feasibility of the current requirements for the placement of RLs in USFS units. ***(Agency must address recommendations 2.1 and 2.2)***

Finding 3: Records Management Training - As noted above, USFS utilizes NWCG Job Aid J-342, *Documentation Unit Leader*, for RM training in a fire incident, but it is not required to qualify for the position, and no classroom training is offered or required. This should be compared to training required for Geographic Information System Specialists (GISS) employed on incidents. GISS receive classroom training that includes the use of uniform file naming conventions and hierarchical filing structures. The USFS RM program should review agency specific RM training for DOCLs and other staff engaged in fire incident activities, as well as training for all staff assigned to ESF-4 activities. In addition, USFS should develop training for

RM staff assigned to Host Units or Forests that handle fire incident or DRR records to ensure the proper review and handling of records returned from the field. (*Agency must address recommendations 3.1, 3.2, and 3.3*)

Finding 4: Records Scheduling - In 2005, the USFS, in association with DOI agencies engaged in fire incident activities, developed one of the first topical interagency schedules. This schedule is currently being reviewed and revised to incorporate additions and changes in fire incident reporting such as the Burned Area Emergency Rehabilitation Report, GIS files, and emails of the incident commander. Once approved by NARA, the proposed schedule will help USFS to meet target 1.4 of M-19-21. In addition to the fire incident schedule, USFS also received NARA approval in 2014 for a schedule that dealt specifically with agency DRR activities in ESF and RSF incidents. (*Agency must address recommendation 4.3*)

Finding 5: Electronic Records Management - The Forest Service utilizes numerous fire incident and DRR EIS. The USFS records manual details the responsibility of the OCIO to include RM in development of EIS and to ensure that the ARO is included in the initial planning and design of new systems and the plans for migration, upgrades, modifications, or the inactivation of existing systems. While this is clearly stated in the agency records manual, no corresponding instructions could be found from either the USFS or U.S. Department of Agriculture OCIO offices. The inclusion of RM in IT development should be clarified by the agency.

USFS developed schedules specifically for EIS and applications associated with fire incidents. These schedules were completed in 2009 but are now in need of review due to system enhancements and migrations over time. In addition, the USFS has not transferred permanent data maintained in these systems to NARA according to the schedule. USFS did not provide an inventory of EIS used in fire incidents or ESF-4 activities. The USFS RM program must prioritize the inventorying and scheduling of EIS associated with fire incidents and ESF-4 activities. (*Agency must address recommendations 5.1, 5.2, and 5.3*)

Finding 6: Intellectual Control of Records - As a participant in the NWCG, the USFS is one of the few agencies that has a detailed list of permanent and temporary documents for the use of DOCLs or IMTs in fire incidents. This guidance has been in place for years and is normalized within operations. However, it was reported at Mendocino National Forest that a contractor had been hired to arrange and digitize fire records stored at the Forest. This brings into question the verification process for fire incident files received by the Host Units or Forests. It was also found that fire incident records are stored in a variety of ways and locations at USFS. NARA received inventories of fire records but noted that these records could be maintained as original paper records copied to thumb drives and placed on official drives, shared drives, Microsoft Sharepoint sites, in cloud storage sharing software, and now in an electronic content management system named PINYON.

USFS OCIO is working to transition to PINYON, but it is still in the development phase and needs to be integrated with current fire and aviation operations recordkeeping practices. As part of this integration USFS RM should inventory fire incident records across the Service and apply dispositions to existing records. USFS RM should ensure, by policy and procedure, the transition of these records into PINYON in a proper filing structure to improve storage and search capabilities within the system. (*Agency must address recommendations 6.1, 6.2, and 6.3*)

Finding 7: Use of Mobile Devices and Social Media Platforms - USFS has policies regarding the use of mobile devices as well as social media capture. However, a review of NWCG resources did not indicate the integration of these policies into fire incident operations, nor was there any indication of their incorporation into DRR policies. USFS RM should ensure the incorporation of these policies into all DRR activities. (*Agency must address recommendation 7*)

**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF DISASTER ASSISTANCE**

Applicable Findings and Recommendations: 1, 2, 3, 4, 5, 6, 7

Role in Disaster Response and Recovery - Under RSF-4, HUD is the coordinating agency for implementing interim and long-term housing solutions for disaster survivors. While HUD works side by side with FEMA in an incident, the Department receives separate Congressional appropriations for disaster assistance and recovery work. These appropriations consist of Community Development Block Grants for Disaster Recovery (CDBG-DR), which are then allocated to communities in need of assistance by HUD. These grants can assist with housing, infrastructure repair and restoration, and economic development. HUD monitors these grants and provides technical assistance as needed to the grantees.

RM Program Overview - The Department RM program is located within the Office of Administration under the Assistant Secretary for Administration. The Departmental Records Management Officer (DMRO) is responsible for all RM policy and procedures and has a staff of five RM personnel assigned to the program. Within each program and regional office, there is a staff member who has records management responsibilities and is designated as a Records Management Liaison Officer (RMLO). RMLOs are responsible for the records disposition programs in their respective offices.

Finding 1: Policy and Procedure Requirements - HUD has general agency policies and guidance for RM, but no specific guidance for offices and staff involved in DRR activities. (*Department must address recommendation 1*)

Finding 2: RM Staffing - HUD does not assign RM personnel to DRR incidents due to the routine nature of the work, according to the Chief of the Office of Disaster Management and National Security (ODMNS). Typically, HUD staff operate out of the FEMA JFO and process disaster loans. HUD staff assigned to DRR incidents include a high-level Disaster Management Group and the Office of Field Policy and Management (FPM), which deploys staff and coordinates operations. In the field, HUD can deploy FPM Disaster Recovery Coordinators, Regional Disaster Liaisons, and Field Office Directors.¹⁰ A RMLO has recently been assigned to assist ODMNS in fulfillment of Departmental RM requirements. The RM program and ODMNS should review HUD staffing requirements in a DRR incident and the integration of RM staff into DRR activities. (*Department must address recommendations 2.1 and 2.2*)

¹⁰ <https://www.hud.gov/sites/documents/HUDDISASTEROPSFAQS.PDF>.

Finding 3: Records Management Training - HUD has no specific RM training for staff assigned to DRR incidents. HUD is already engaged in a review of Departmental training under a previous NARA inspection and should include a review activity of staff assigned to DRR incidents within the context of that work. (*Department must address recommendations 3.1 and 3.2*)

Finding 4: Records Scheduling - HUD disaster program administrative records were scheduled in 1976. They have not been reviewed or updated since that date. The HUD RM program is currently reviewing these schedules and should review disaster response program records generated by ODMNS and Disaster Recovery and Special Issues Division to determine whether schedule updates are needed for these offices.

In addition, HUD should review the Departmental Grant Financial Assistance schedule or HUD records disposition schedule 8, which currently covers CDBG-DR grants. Approved in 2004, it appears that schedule 8 superseded portions of schedule 69 for Community Planning and Development Records that specifically addresses CDBG disaster assistance records. Schedule 69 is still an active schedule on the HUD website. This redundancy should be examined by the HUD ARO, along with a thorough review of CDBG-DR grant activities, to determine whether schedule 8 was applied to the records in accordance with NARA appraisal instructions that each HUD financial assistance program review their business processes and inventory their files to see how the schedule would apply to their program records. (*Department must address recommendations 4.1 and 4.3*)

Finding 5: Electronic Records Management - The HUD RM program is an active participant in the EIS development lifecycle process at the Department. However, HUD did not provide the NARA inspection team with an inventory of EIS used in DRR activities at the Department. The primary activity during a DRR incident is the awarding of grants under the Community Development Block Grants for Disaster Recovery program. These grants are tracked in the Disaster Recovery Grant Reporting System (DRGR). This system has now transitioned to a new version without being scheduled by the agency. HUD should include this system in its current scheduling initiative along with a comprehensive inventory of systems in use by offices engaged in DRR activities. (*Department must address recommendations 5.2 and 5.3*)

Finding 6: Intellectual Control of Records - In fulfillment of the requirements of a previous NARA inspection, HUD is currently conducting inventories and creating file plans for all Department records. (*Department must address recommendations 6.1, 6.2, and 6.3*)

Finding 7: Use of Mobile Devices and Social Media Platforms: Other than policies for issuance of property, there was no evidence of procedures to capture Federal records from government or personally-owned mobile devices and social media platforms. The HUD RM program should include policies and procedures regarding the use of mobile devices and social media platforms in DRR incidents as part of the response to Finding 1 of the NARA inspection of October 2018. (*Department must address recommendation 7*)

**U.S. SMALL BUSINESS ADMINISTRATION
OFFICE OF DISASTER ASSISTANCE**

Applicable Findings and Recommendations: 1, 2, 3, 4, 5, 6, 7

Role in Disaster Response and Recovery - The SBA acts as a primary coordinating partner in RSF-2 relating to economic recovery. Like HUD, SBA also operates independently of FEMA in a disaster and issues its own disaster declarations. These declarations allow the agency to provide low interest loans to help businesses and homeowners recover from major incidents. These loans are used to supplement disaster assistance provided by FEMA and HUD, and are targeted to help businesses of all sizes, nonprofit organizations, homeowners, and renters return to normal as quickly as possible following an incident. The program includes four categories of loans for disaster-related losses: home disaster loans, business disaster loans, economic injury disaster loans, and military reservist economic injury loans.

RM Program Overview - The SBA ARO is the Director of the Records Management Division and operates under the Office of Administrative Services. The SBA utilizes RLs throughout the agency to ensure that all records are created, maintained, and disposed of according to policy.

Finding 1: Policy and Procedure Requirements - There are general agency policies and guidance for RM but no specific guidance for offices and staff involved in DRR activities. The RM policies and guidance in effect are dated 1998 and are currently being updated by the SBA ARO. The SBA *Disaster Preparedness and Recovery Plan* of 2018 does not provide guidance for RM in a DRR incident.¹¹ (*Agency must address recommendation 1*)

Finding 2: RM Staffing - No specific RM personnel are assigned to DRR incidents. In DRR incidents, SBA operates Customer Service Centers that can handle up to 2,000 calls a day. SBA also utilizes Field Operations Centers that coordinate operations during an incident, along with loan Processing and Disbursement Centers and Administrative Service Centers. In addition, SBA operates Damage Verification Centers to conduct disaster surveys with FEMA, state, and local officials. SBA RM personnel assigned to offices and programs involved in DRR operations were not present at meetings with NARA. The SBA RM program should work with the Office of Disaster Assistance to review staffing requirements in a DRR incident and the integration of RM staff into DRR activities. (*Agency must address recommendations 2.1 and 2.2*)

Finding 3: Records Management Training - SBA relies heavily on data entry into EIS during DRR incidents and does not provide specific RM training for staff engaged in DRR activities. The SBA RM program should review agency activities in DRR incidents to determine training needs and requirements. (*Agency must address recommendations 3.1 and 3.2*)

Finding 4: Records Scheduling - SBA operates under a DRR schedule from 1986, with updates in 1995-1996. Currently, only SBA disaster declarations are permanent. An updated schedule was prepared in 2018, but has not been submitted to NARA for review and approval. The SBA ARO should conduct a thorough review of agency activities in DRR incidents prior to the submission of a new schedule. (*Agency must address recommendations 4.1 and 4.3*)

¹¹ <https://www.sba.gov/sites/default/files/2018-07/2018-disaster-preparedness-and-recovery-plan.pdf>.

Finding 5: Electronic Records Management - SBA RM was included in the Systems Development Lifecycle plan of 2009, but only at the end of the EIS development lifecycle and not at the outset of systems planning.¹² A SBA OIG report of the same year found that the agency was without policies and procedures for the management of electronic records. These deficiencies had existed since a prior inspection in 1999, and it was recommended that SBA RM officials develop a comprehensive ERM program.¹³ The findings and recommendations of this report still have not been addressed and should be reviewed and included in the update of policies and guidance under preparation by the SBA ARO.

SBA did not provide the NARA inspection team with an inventory of EIS used in DRR activities at the agency. The primary activity of SBA during a DRR incident is to process loan applications and make determinations for the disaster loan program. These loans are tracked in the Disaster Credit Management System (DCMS). DCMS has also transitioned to a new version without being scheduled by the SBA. The SBA ARO must schedule this system, as well as any other systems in use for DRR activities. (*Agency must address recommendations 5.1, 5.2, and 5.3*)

Finding 6: Intellectual Control of Records - The SBA ARO is working to update agency records inventories and file plans. (*Agency must address recommendations 6.1, 6.2, and 6.3*)

Finding 7: Use of Mobile Devices and Social Media Platforms: Other than policies for issuance of property, there was no evidence of procedures to capture Federal records from government or personally-owned mobile devices and social media platforms. SBA should develop policies and procedures to address the use of these devices and platforms during DRR incidents. (*Agency must address recommendation 7*)

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
ASSISTANT SECRETARY FOR PREPAREDNESS AND RESPONSE**

Applicable Findings and Recommendations: 1, 2, 3, 4, 5, 6, 7

Role in Disaster Response and Recovery - HHS is the primary coordinator for public health and medical service under ESF-8. HHS and the Assistant Secretary for Preparedness and Response (ASPR) provide the mechanism for coordinated Federal assistance to supplement state, tribal and local resources in response to a public health and medical disaster, potential or actual incidents, or during a developing public health and medical disaster. HHS is the coordinating agency for the health and social services recovery support function. HHS supports locally led recovery efforts to address public health, health care facilities and coalitions, and essential social service needs.

RM Program Overview - ASPR is a staff division under the HHS Office of the Secretary (OS) and is overseen by the OS Records Officer. The OS Records Officer reports to the Departmental Records Officer (DRO). ASPR has a designated Records Manager who works directly with

¹² https://www.sba.gov/sites/default/files/resources_article/SBA%20System%20Development%20Methodology.pdf.

¹³ <https://www.sba.gov/document/report-9-23-audit-report-09-23-survey-electronic-records-management>.

division directors/deputy directors, branch chiefs, administrative officers, program leads and assigned staff within each office.

Finding 1: Program Policy and Procedure Requirements - HHS/ASPR has an up-to-date RM manual for files maintenance and disposition, but it does not provide guidance to staff assigned to DRR incidents. According to the manual, this type of guidance should be developed by the offices and divisions themselves. Currently, functional areas within ASPR are creating SOPs that include RM information. This information primarily entails the inclusion of record schedules to be utilized in an incident by elements in the field. These SOPs need to be reviewed to ensure adequate integration of RM into DRR activities including records schedule implementation, roles and responsibilities, and coordination between DRR teams in the field and RM staff at HQ.

(Department must address recommendation 1)

Finding 2: RM Staffing - HHS/ASPR deploys numerous DRR teams. The National Disaster Medical System (NDMS) includes Disaster Medical Assistance Teams, Trauma and Critical Care Teams, Disaster Mortuary Operations Teams, National Veterinary Response Teams, and Victim Information Center Teams. The activities of these teams are coordinated by an IMT, which operates under the NIMS ICS.¹⁴ NARA did not note any specific RM functions among the HHS teams involved with DRR incidents or events, and was told that RM provides support to incident operations on an *ad hoc* basis as requirements and needs vary depending on the incident or event. The ASPR Records Manager was knowledgeable of operations, but efforts should be made to better integrate RM into DRR incident activities. ***(Department must address recommendations 2.1 and 2.2)***

Finding 3: Records Management Training - ASPR has general RM training for new hires. Also electronic recordkeeping and tailored training for divisions/branches and programs. ASPR utilizes NIMS ICS training but efforts should be made to review RM training requirements for all staff assigned to DRR incidents.

(Department must address recommendations 3.1, and 3.2)

Finding 4: Records Scheduling – HHS schedules for DRR incident records were approved by NARA in 2013-2014. These schedules designate as permanent DRR records that engender historical interest and list some record types that are to be included in the final files. ASPR RM should review the implementation of these schedules by staff assigned to DRR incidents to monitor what types of records are being created and retired by DRR teams under the permanent item in the schedules. ASPR should review the use of other agency schedules in DRR incidents or events. ***(Department must address recommendations 4.2 and 4.3)***

Finding 5: Electronic Records Management - RM is well-integrated into the IT process at HHS. ASPR RM is collaborating with the IT Division to develop an ERM strategy to inventory electronic records and move them to a Sharepoint system. ASPR RM and IT are also engaged in the inventorying and scheduling of numerous EIS, including important systems such as the Technical Resources, Assistance Center, and Information Exchange (TRACIE), which is used to share information regarding DRR activities. HHS/ASPR should continue efforts to schedule EIS

¹⁴ <https://www.phe.gov/Preparedness/planning/mscc/Documents/mscctier2jan2010.pdf>.

and move to a standard electronic storage environment for DRR records. (*Department must address recommendations 5.2 and 5.3*)

Finding 6: Intellectual Control of Records - ASPR has conducted an inventory of paper and electronic records in preparation to move into a Sharepoint environment. An inventory of EIS has also been prepared so that the systems can be scheduled by HHS. The HHS DRO, in association with the OS and ASPR Records Managers, should ensure the completion of this work. (*Department must address recommendations 6.1 and 6.3*)

Finding 7: Use of Mobile Devices and Social Media Platforms - HHS is updating Departmental policies to include the capture of records from government or personally-owned mobile devices and social media platforms, but must ensure that these policies are incorporated into DRR policies and guidance. (*Department must address recommendation 7*)

**DEPARTMENT OF THE INTERIOR
OFFICE OF EMERGENCY MANAGEMENT
OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE**

Applicable Findings and Recommendations: 1, 2, 3, 4, 5, 6, 7

Role in Disaster Response and Recovery - DOI serves as a responding agency for ESF-11 and provides assistance in the protection of natural and cultural resources during an incident. In recovery functions DOI is the coordinating agency for the Natural Cultural Resources Recovery and Support or RSF-6. Agencies involved in this function work to preserve, conserve, rehabilitate, and restore natural resources and historic properties in communities impacted by disasters.

RM Program Overview - The DOI RM program is located in the Office of the Chief Information Officer (OCIO) and is directed by a DRO. The Departmental RM program provides policy and guidance for all RM programs of the bureaus and offices of DOI. The Office of Emergency Management (OEM) and the Office of Environmental Policy and Compliance (OEPC) fall under the OS, which has a RM assigned to the program.

Finding 1: Program Policy and Procedure Requirements - The Department Records Manual (DM 380) is being updated, but currently there is no specific RM guidance for offices and staff involved in DRR activities. (*Department must address recommendation 1*)

Finding 2: RM Staffing - OEPC has produced an SOP for NRF ESF-11 activations that designates a Natural and Cultural Resources and Historic Properties coordinator who establishes and maintains official files and records of pertinent correspondence, reports, and other information generated during response incidents.¹⁵ DOI OEPC incident policy guidance from 2007 mentions the use of DOCLs on ISTs, though this position is staffed as needed in a DRR incident. RLs from OEPC and OEM need to be more closely integrated into the activities of DRR coordinators and advisors assigned to the field and HQ. (*Department must address recommendations 2.1 and 2.2*)

¹⁵ <https://www.doi.gov/sites/doi.gov/files/uploads/ESF11SOP.pdf>.

Finding 3: Records Management Training - DOI OEPC incident policy guidance from 2007 mentions the use of DOCLs and GISSs on agency ISTs, though this position is staffed as needed in a DRR incident. No agency-specific RM training is mentioned in this guidance. ***(Department must address recommendations 3.1, 3.2, and 3.3)***

Finding 4: Records Scheduling - The DOI RM program is actively reviewing and rescheduling Disaster and Incident Management Records for the entire Department. Records of DOI participation in historically significant DRR incidents are proposed for permanent retention. Incidents where DOI offices are not the primary response element are to be scheduled as temporary records. This schedule will eventually replace the current OEPC schedule, which was approved in 2011, and which also makes OEPC policy and historic incident files permanent. The selection of historic DRR incident files and the contents of these files is not well defined in the current schedule and should be reviewed in conjunction with the Departmental rescheduling effort. ***(Department must address recommendations 4.2 and 4.3)***

Finding 5: Electronic Records Management - The DOI RM program has been working to implement an eMail Enterprise Records and Document Management System (eERDMS) for several years. As a result, RM and IT are well integrated in the Department. eERDMS includes a robust enterprise content system that will capture electronic records maintained by OEM/OEPC. eERDMS will not interface with all Departmental EIS, which must be scheduled by the RM program. Currently, DRR programs at DOI do not utilize stand-alone EIS for their activities in the field. Given the dynamic nature of DRR IT activities DOI should work to issue the guidance for ERM that is being developed in the new Departmental RM manual. ***(Department must address recommendation 5.2)***

Finding 6: Intellectual Control of Records - DOI has detailed file plans for OEM/OEPC, but no inventories were provided to the NARA inspection team. Policies and procedures for the control of records in DRR incidents need to be developed by the Department. ***(Department must address recommendations 6.1, 6.2, and 6.3)***

Finding 7: Use of Mobile Devices and Social Media Platforms: DOI has general policies for the capture of Federal records from government or personally-owned mobile devices as well as social media platforms and is developing guidance for text messages. However, DOI should ensure the incorporation of this guidance into DRR policies and procedures. ***(Department must address recommendation 7)***

APPENDIX B INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine if DRR records created and maintained at the agencies chosen are in compliance with the Federal Records Act; 36 CFR Chapter XII, Subchapter B.

This inspection focused on records of emergency or major disasters created by a Presidential Declaration as specified by the Stafford Act as well as records created under a Fire Management Assistance Declaration (FMAD) as outlined in 44 CFR 204.21(a)(b) and those records created during the response support process as outlined in the NRF or those recovery activities as outlined in the NDRF.

There was a particular emphasis on electronic records management and the management of DRR records in electronic systems, the ability to digitize or convert analog records, and on the ability to maintain and transfer DRR records to the National Archives.

METHODOLOGY

This inspection was carried out by site visits with the records managers, custodians, coordinators and/or liaisons for agencies and/or offices selected, including program area staff who create and maintain DRR records. Meetings also included management or supervisory staff for DRR programs. In addition, the inspection team:

- Reviewed records management policies, directives, and other documentation.
- Interviewed program staff at the locations visited.
- Used a detailed checklist of questions based on Federal statutes and regulations, and NARA guidance.
- Reviewed responses to current and past annual Records Management Self-Assessments (RMSA), Senior Agency Official for Records Management, and Federal Email Management reports.

OFFICES AND PROGRAMS VISITED AND TELECONFERENCES CONDUCTED

HQ Programs

- DOI, Office of Emergency Management, Office of Environmental Policy and Compliance
- FEMA, Office of the Chief Administrative Officer, Information Management Division
- HHS, Office of the Assistant Secretary for Preparedness and Response
- HUD, Office of Disaster Management and National Security
- SBA, Office of Disaster Assistance
- USFS, Office of State and Private Forestry
- USACE, Office of Emergency Management

Regional Offices

FEMA

- Region IV, Atlanta, GA
- Region VI, Denton, TX

USACE

- South Atlantic Division, Atlanta, GA
- Mobile District, Mobile, AL
- Southwestern Division, Dallas, TX
- Fort Worth District, Fort Worth, TX
- Galveston District, Galveston, TX

USFS

- Region 5, Vallejo, CA
- Mendocino National Forest, Willows, CA
- Northern California Geographic Area Coordination Center, Redding, CA

Teleconferences

- USFS
- Disaster and Emergency Operations, Washington, DC
- Southern Area Coordination Center, Atlanta, GA

APPENDIX C

RELEVANT INSPECTION DOCUMENTATION

Department of Homeland Security

National Disaster Recovery Framework, 2nd Edition, June 2016.
National Preparedness System, November 2011.
National Response Framework, 3rd Edition, June 2016.
2018 National Preparedness Report.

Federal Emergency Management Agency

Disaster Response and Recovery Activities

Incident Management Handbook, FEMA B-761, November 2017.
ICS Review Document, Extracted from E/L/G 0300 Intermediate Incident Command System for Expanding Incidents, ICS, March 2018.
National Incident Management System, 3rd Edition, October 2017.
National Incident Management System Guideline for the National Qualification System, November 2017.
National Qualification System (NQS) Position Task Book for the Position of Documentation Leader, September 2017.
OIG-19-58, FEMA's Longstanding IT Deficiencies Hindered 2017 Response and Recovery Operation, August 27, 2019.
Web Emergency Operations Center (WebEOC) Interconnectivity, Fiscal Year 2017 Report to Congress, May 29, 2018.

Records Management

FEMA Directive 141-1, *FEMA Records Management Program*, March 6, 2014.
FEMA Manual 141-1-1, *Records Management, Files Maintenance and Records Disposition*, March 7, 2014.
FEMA Manual 141-1-1b, *Records Disposition Schedule*, 2016.

US Army Corp of Engineers

Disaster Response and Recovery Activities

Engineering Regulation 500-1-1, *Civil Emergency Management Program*, September 30, 2001.
Engineering Regulation 500-1-28, *National Response Planning Guide*, January 31, 2001.

Records Management

DA PAM 25-403, *Guide to Recordkeeping in the Army*, August 11, 2008.
Army Regulation 25-1, *Army Information Technology*, July 15, 2019.

Army Regulation 25-400-2, *The Army Records Information Management System (ARIMS)*, October 2, 2007.
Engineering Regulation 25-60-1, *Records Management Program*, June 30, 2015.

US Forest Service

Disaster Response and Recovery Activities

NIFC, *Interagency Standards for Fire and Aviation Operations*, February 2019.
NWCG, *Documentation Unit Leader*, J-342, November 2008.
NWCG, Incident Planning Subcommittee, Records Management,
<https://www.nwcg.gov/committees/incident-planning-subcommittee>.
USFS, *Reference Guide Emergency Support Function #4*, July 2018.

Records Management

Forest Service Handbook, FHS 6209.11, *Records Management Handbook*, July 19, 1996 with chapter updates.
Forest Service Manual, FSM 6230, *Records Management Program*, April 30, 2018.

Department of Housing and Urban Development

Disaster Response and Recovery Activities

Programs of HUD, Major Mortgage, Grant, Assistance, and Regulatory Programs, 2018.
HUD Disaster Operations: Frequently Asked Questions, May 25, 2017.

Records Management

HUD Handbook 2228.1, *Records Disposition Management*, December 1989.
HUD Handbook 2225.6 (Rev.1), *HUD Record Disposition Schedules*, August 2011.

Small Business Administration

Disaster Response and Recovery Activities

SBA Disaster Preparedness and Recovery Plan, 2018.
SBA, U.S. Small Business Administration, FY 2020 Congressional Justification, FY 2018. Annual Performance Report, Performance Plan, Budget, and Report, May 23, 2019.

Records Management

SBA OIG Audit Report 09-23: *Survey of Electronic Records Management*, September 15, 2009.
SBA SOP 00 41 2, *Records Management Program*, December 1, 1998.

SBA *System Development Method 2.1*, June 24, 2009.

Department of Health and Human Services/Assistant Secretary for Preparedness and Response/Office of Emergency Management and Medical Operations

Disaster Response and Recovery Activities

HHS, *Medical Surge Capacity and Capability: The Healthcare Coalition in Emergency Response and Recovery*, May 2009.

ASPR, *ESF#8 – Health and Medical Response in Puerto Rico and the U.S. Virgin Islands*, nd.

HHS/ASPR, Disaster Leadership Group (DLG), Standard Operating Procedure, SOP Number, ASPR-OPP-3001.01, May 29, 2019.

Records Management

ASPR File Maintenance and Disposition Manual, September 2015.

ASPR Records Management Policy, June 17, 2013.

Department of the Interior/Office of Emergency Management/Office of Environmental Compliance

Disaster Response and Recovery Activities

DOI Departmental Manual, 900-DM, *Emergency Management Program*, January 4, 2006.

DOI/OEPC, *Standard Operating Procedures for National Response Framework Activations Emergency Support Function #11 Natural and Cultural Resources and Historic Properties Protection*, July 2015.

FEMA, *Natural and Cultural Resources Recovery Support Function (NCR RSF), Field Operations Manual*, September 2018.

Records Management

OEPC Environmental Administrative Memorandum No 14-8, *Management of OEPC Records and Files*, September 3, 2014.

APPENDIX D AUTHORITIES AND FOLLOW-UP ACTIONS

AUTHORITIES

- 44 U.S.C. Chapter 29
- 36 CFR Chapter XII, Subchapter B
- 36 CFR 1239, Program Assistance and Inspections

OTHER GUIDANCE

- OMB/NARA *Transition to Electronic Records* (M-19-21)
- Other NARA Bulletins currently in effect - <https://www.archives.gov/records-mgmt/bulletins>

STATUTES AND REGULATIONS

36 CFR Chapter XII, Subchapter B, specifies policies for Federal agencies' records management programs relating to proper records creation and maintenance, adequate documentation, and records disposition. The regulations in this Subchapter implement the provisions of 44 U.S.C. Chapters 21, 29, 31, and 33. NARA provides additional policy and guidance to agencies at its records management website - <http://www.archives.gov/records-mgmt/>.

At a high level, agency heads are responsible for ensuring several things, including:

- The adequate and proper documentation of agency activities (44 U.S.C. 3101);
- A program of management to ensure effective controls over the creation, maintenance, and use of records in the conduct of their current business (44 U.S.C. 3102(1)); and
- Compliance with NARA guidance and regulations, and compliance with other sections of the Federal Records Act that give NARA authority to promulgate guidance, regulations, and records disposition authority to Federal agencies (44 U.S.C. 3102(2) and (3)).

FOLLOW-UP ACTIONS

Concerned departments and agencies will submit to NARA a Plan of Corrective Action (PoCA), to include applicable findings and recommendations applicable to the office or programs involved, that specifies how the agency will address each inspection report recommendation, including a timeline for completion and proposed progress reporting dates. The plan must be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

NARA will analyze the adequacy of the action plan, provide comments to the department and agency on the plan within 60 calendar days of receipt, and assist in implementing recommendations.

The department or agency ROs will submit to NARA progress reports on the implementation of the action plan until all actions are completed. NARA will inform each department or agency when progress reports are no longer needed.

APPENDIX E
ACRONYMS AND ABBREVIATIONS

AHJ	Authority Having Jurisdiction
ARIMS	Army Records and Information Management System
ARO	Agency Records Officer
ASPR	Assistant Secretary for Preparedness and Response
CDBG-DR	Community Development Block Grants for Disaster Recovery
CFR	Code of Federal Regulations
DCMS	Disaster Credit Management System
DHS	Department of Homeland Security
DLG	Disaster Leadership Group (HHS)
DMRO	Departmental Records Management Officer
DOCL	Document Unit Leaders
DOI	Department of the Interior
DRGR	Disaster Recovery Grant Reporting System
DRO	Departmental Records Officer
DRR	Disaster Response and Recovery
eCAPS	Enterprise Coordination and Approvals Processing System
eERDMS	eMail Electronic Records and Document Management System (DOI)
EIS	Electronic Information System
EM	Emergency Management
EMMIE	Emergency Management Mission Integrated Environment
emPOWER	Emergency Power System
ENGLink	Application used by the US Army Corps of Engineers
ERM	Electronic Records Management
ERMS	Electronic Records Management System
ESF	Emergency Support Functions
FEMA	Federal Emergency Management Agency
FMAD	Fire Management Assistance Declaration
FOIA	Freedom of Information Act
FPM	Office of Field Policy and Management
GISS	Geographic Information System Specialists
HHS	Health and Human Services (Department of)
HQ	Headquarters
HUD	Housing and Urban Development (Department of)
IMT	Incident Management Teams
ICS	Incident Command System
IST	Incident Support Teams
IT	Information Technology

JFO	Joint Field Office
NARA	National Archives and Records Administration
NDMS	National Disaster Medical System
NDRF	National Disaster Recovery Framework
NEMIS	National Emergency Management Information System
NIFC	National Interagency Fire Center
NIMS	National Incident Management System
NQS	National Qualification System
NRF	National Response Framework
NWCG	National Wildfire Coordinating Group
OCIO	Office of the Chief Information Officer
ODMNS	Office of Disaster Management and National Security
OEM	Office of Emergency Management
OEPC	Office of Environmental Policy and Compliance
OIG	Office of Inspector General
OMB	Office of Management and Budget
ORMS	Office of Regulatory Management Services
OS	Office of the Secretary (HHS)
PINYON	Electronic system used by the US Forest Service named for a type of tree
PTB	Position Task Book
RC	Records Custodians or Coordinators
RFO	Recovery Field Office
RL	Records Liaison
RLO	Records Liaison Officer
RM	Records Management
RMLO	Records Management Liaison Officer
RMSA	Records Management Self-Assessment
RSF	Recovery Support Functions
SBA	Small Business Administration
SOP	Standard Operating Procedure
SRC	Special Records Collection
TRACIE	Technical Resources, Assistance Center, and Information Exchange
U.S.C.	United States Code
uCOP	USACE Common Operating Picture
USACE	United States Army Corps of Engineers
USFS	United States Forest Service
WebEOC	Web Emergency Operations Center
WebIFMIS	Web Integrated Financial Management Information System



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