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Defense Logistics Agency
Records Management Program

Records Management Inspection Report

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**DEFENSE LOGISTICS AGENCY
RECORDS MANAGEMENT PROGRAM**

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, if necessary, to make improvements to their programs based on inspection findings and recommendations.

In May and June 2017, NARA inspected the records management (RM) program of the Defense Logistics Agency (DLA) as part of a multi-year plan to inspect the RM programs of the Department of Defense (DOD) components. The purpose of this inspection was to examine how well DLA complies with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures. In particular it focused on the management of permanent electronic records, including email and social media communications. Additionally, it sought to identify practices of interest to other DOD agencies and the wider Federal records management community.

While many aspects of DLA's records management program are compliant, there are areas of the program that are non-compliant with various elements of 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B.² Failure to manage records in a compliant manner increases the risk that records will not be readily accessible for supporting DLA's mission essential functions to DOD and other federal agencies, and for accountability to Congress and public. It also increases the risk of loss of Federal data and records and that permanent records may not be retained for eventual transfer to the National Archives, as required by 44 U.S.C. § 3101.³ To help mitigate the risks associated with noncompliance with 36 CFR Chapter XII, Subchapter B, this report makes 17 findings and 25 recommendations. Follow-up actions required for DLA and NARA are included in Appendix A.

¹ 44 U.S.C. Chapter 29, <http://www.archives.gov/about/laws/recordmanagement.html>.

² 36 CFR Chapter XII, Subchapter B, <https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title36/36CXIIsubchapB.tpl>.

³ 44 U.S.C. Chapter 31, <https://www.archives.gov/about/laws/fed-agencies.html#records>.

OVERVIEW OF THE DLA RECORDS MANAGEMENT PROGRAM

DLA's RM program is headed by the Records Management Program Manager. The Agency Records Officer (ARO) reports to the Records Management Program Manager. The ARO is supported by 23 full-time "component records officers" (CRO). The DLA also has over 1,200 "records coordinators" (RCs), who are assigned collateral RM duties, located in all program offices. Compared with other DOD components, the DLA RM office has a relatively large number of full-time RM staff.

DLA's RM program is aligned under the Enterprise Capabilities Portfolio Management Division (J62BM), a part of the Information Operations Directorate's (J6) Document Services business line. J62BM's primary mission is offering RM services to DOD agencies. DLA is one of 14 DOD components that uses J62BM's web-based records management product called Document Automation and Content Services (DACS).⁴ This service is supported by 10 full-time contractors who report to the DLA Records Management Program Manager.

FINDINGS AND RECOMMENDATIONS

The DLA RM Program has positive RM initiatives and practices, listed in the Records Management Program Strengths section of this report, including senior leadership support, records management training, a records management application (RMA) and demonstrable access and retrieval of their records that indicate a strong program. However, this report makes the following findings and recommendations noting specific areas of weakness and lack of full compliance with federal records management regulations.

POLICY, DIRECTIVES, GUIDANCE, AND MANUALS

Finding 1: DLA RM directives do not list and define the roles and responsibilities for the RM Program Manager and the RM Program Management Office (PMO).

DLA has issued and disseminated RM policies, directives, and manuals (identified in Appendix B) as required by 36 CFR 1220.34(c). These documents provide comprehensive guidance and procedures for DLA's RM program, and the roles and responsibilities of the DLA ARO and CROs. None of the documents, however, list the role and responsibilities of the RM Program Manager or the RM PMO that define their relationship with, and distinguishes it from those of the ARO.

As a result, the ARO and the RM Program Manager appear to have overlapping RM responsibilities. For example, the DLA Freedom of Information Act (FOIA) Officer contacted the RM Program Manager to coordinate DLA's implementation of a new FOIA tracking and disposition system, although this is defined as an ARO role by DLA Instruction (DLAI) 5015.01.⁵ The lack of clear responsibilities contributes to poor communication between the ARO

⁴ Document Automation and Content Services - Records Management Solution, http://www.dla.mil/Portals/104/Documents/DocumentServices/pdf/J6_Recordsmanagement_20151014.pdf.

⁵ DLAI 5015.01, *Records Management*, dated December 17, 2012.

and RM Program Manager, which affects consistent internal and external guidance and release of information. For example, the RM PMO provided the inspection team a records life-cycle process flow diagram, but the diagram was not reviewed or coordinated with the ARO prior to releasing it to the inspection team.

Since the RM Program Manager and ARO positions are held by different people, it is particularly important that the duties, authorities, and responsibilities be clearly defined.

Recommendation 1: DLA must revise its applicable directives, instructions, and manuals to clearly define and distinguish the roles, responsibilities, lines of communication, and authorities of the RM Program Manager and the RM PMO. (36 CFR 1220.34(c))

EVALUATION AND OVERSIGHT

Finding 2: The effectiveness of RM evaluations conducted by CROs and RCs is limited by the failure to produce written reports of the findings and results.

DLA conducts RM evaluations of selected programs every 1-2 years in compliance with 36 CFR 1220.34(j). The ARO has established performance measures for conducting evaluations. RCs and CROs use a detailed checklist to ensure all DLA RM requirements are assessed in program offices. The checklist results are provided to the ARO in accordance with DLA's RM directives, and the ARO and CROs track the progress of corrective actions.

The last set of evaluations was conducted in 2015, but written reports were not created as required by DLA policy. This means that the results cannot be easily shared with program managers and senior leaders in order to review the status of the RM program, identify areas needing greater management attention, or share best practices. The ARO does plan to issue written reports for DLA's next series of RM inspections planned for 2017.

Recommendation 2.1: CROs and RCs must prepare a written evaluation report for the last evaluation and submit it to the ARO and applicable program managers in accordance with DLA policy. (DLAI 5015.01)

Recommendation 2.2. The ARO should re-establish the procedure that includes periodic summary written reports for DLA senior leaders based on evaluation reports.

PROGRAM IMPLEMENTATION

Finding 3: The ARO's draft RIM Performance Goals and Measurements Plan and the draft RIM Strategic Performance Goals and Action Plan have not been approved and disseminated.

The ARO has developed a detailed Records and Information Management (RIM) Performance Goals and Measurement Plan and a RIM Strategic Performance Goals and Action Plan that identify clear objectives, performance goals, and metrics for FY 2017-2019. One of the plans specifically covers the implementation of DACS-RM to all DLA program offices and revises the RM programs FY 2016 Performance Goals and Measurements Gaps Analysis. Both plans cover all aspects of its RM program and their recommended actions match many of the findings and recommendations in this report. Both plans have been submitted to the RM Program Manager for J6 approval.

Approving the two plans will positively impact the DLA RM program by setting the strategic direction and priorities for making improvements to the RM program. It will provide program managers with a common set of RM goals and milestones, and performance measures for RM staff. It will also allow the ARO to measure progress towards approved goals. If implemented, the plans will significantly improve the internal DLA RM program.

Recommendation 3: Review and approval of the draft RIM Performance Goals and Measurements Plan and the draft RIM Strategic Performance Goals and Action Plan should be completed and the plans disseminated throughout DLA.

Finding 4: Program offices that create and maintain classified records do not comply with DOD Instruction 5200.01 requiring offices to provide the information necessary for the ARO to monitor compliance with Federal and DOD RM regulations.

Program offices have disregarded requests from the ARO for information about the maintenance of classified records to determine whether these records are being managed in accordance with Federal recordkeeping requirements. In particular, the J6 COMSEC office has consistently refused requests from their CRO and the ARO to provide information as to how its records are being managed. These program offices have not appointed RCs and have not provided file plans to their designated CROs for approval as required by DLAI 5015.01.

All DLA records, regardless of classification, must be managed in accordance with Federal, DOD, and DLA RM regulations. DOD Instruction (DODI) 5200.01 directs DOD component heads to ensure classified information and CUI are managed and retained in accordance with DOD Component authorized records management manuals and NARA-approved schedules.⁶

⁶ DODI 5200.01, *DOD Information Security Program and Protection of Sensitive Compartmented Information (SCI)*, dated April 21, 2016; and H.R. 1233, *Presidential and Federal Records Act Amendments of 2014*, dated November 26, 2014.

Recommendation 4: DLA program offices creating and maintaining classified records must designate an RC; complete DLA Form 1689, File Outline; and provide their CRO and ARO the current status of their records. (36 CFR 1220.34(d) and DLAI 5015.01)

Finding 5: DLA does not follow its own established procedures for exit briefings for departing employees and senior officials.

36 CFR 1222.24(a)(6) requires agencies to develop procedures to ensure departing employees and senior officials do not destroy or remove Federal records from agency custody. DLAI 5015.01 provides policy and procedures requiring functional program managers and business unit supervisors to ensure their departing personnel, including senior leaders, do not destroy or remove records and complete and submit DLA Form 1937, *Records Management Checklist for Transfer/Departing Personnel*, when appropriate.

DLA is conducting exit briefings, but according to the ARO, the DLA Form 1937 is not being used as directed. The ARO is aware of the deficiency and plans to revise the form and reinstitute the exit briefing process.

Recommendation 5: The ARO must complete the revision of DLA Form 1937 and re-establish controls to ensure exit briefings are conducted and documented for all senior leaders and employees separating from DLA. (36 CFR 1222.24(a)(6))

Finding 6: Many DLA program offices do not identify their essential (vital) records.

36 CFR 1223.16 requires agencies to identify essential (vital) records needed for the agency to respond during an emergency and to protect the legal and financial rights of the Government. DLAI 5015.01 also requires all DLA offices to identify their essential records on their file plans, DLA Form 1689, *File Outline*. The instruction also requires Continuity of Operations (COOP) Point of Contacts (POCs) to coordinate this activity with RCs or CROs.

Review of the 24 file plans shared with the inspection team revealed only two program offices that identified their essential records: the Logistics Operations, Management Support (J32M) and the Disposition Services, Demilitarization Policy Branch (J311). Many of the other file plans contain potential essential records regarding delegations of authority and legal and financial rights of the Government that are not marked as essential.

According to the ARO, no coordination is currently being done with COOP officials to ensure essential records are identified and protected.

Recommendation 6.1: Programs offices must coordinate their file plans with COOP officials prior to the CRO approving them as required by DLAI 5015.01 to ensure essential records are identified and protected. (36 CFR 1223.12)

Recommendation 6.2: A review and update of all file plans must be conducted to ensure essential records are properly identified. (DLAI 5015.01)

Finding 7: Records inventories are outdated and incomplete.

According to the DLA ARO, the last complete records inventory of all program offices was finished in 1991. Conducting an agency-wide inventory of DLA records will help reduce errors in file plans, improve the identification of essential records, lead to the identification of unscheduled records, and provide a more accurate transition of DLA's records to the DACS-RM application. DLA Manual (DLAM) 5015.01, Volume 1, provides clear instructions and procedures for conducting an inventory and should be used to update DLA's records inventory.⁷

Recommendation 7: With guidance from the ARO, DLA must initiate and complete a full inventory of its records. (36 CFR 1225(a) and (b))

Finding 8: DLA file plans contain incorrect series, cutoffs, and dispositions.

The inspection team reviewed a small sample of the nearly 3,000 file plans used within DLA. In comparing records series the plans had in common, the team found several discrepancies and inaccuracies in areas such as cutoffs, disposition instructions, and General Records Schedule (GRS) references. Some of the discrepancies and inaccuracies include:

- Different cutoff and disposition instructions are used for series 5240.6 and 5240.7
- Different disposition instructions are used for series 5300.4 and 5300.9
- Different GRS references are used for series 5015.1
- Different records titles and descriptions are used for the same series 5300.12

Given the number of errors found within the small sample of file plans, the probability is high that other file plans have similar errors.

File plans are a valuable tool for organizing, locating, and managing records applicable to a program office. They save program offices time by not having to refer to hundreds of records series belonging to the entire agency. They are most effective if they contain accurate information so that records are disposed of according to approved disposition instructions. Inaccurate disposition instructions raises the risk of records being disposed of without authorization.

Recommendation 8: The ARO and CROs must complete additional reviews of file plans, including verifying the accuracy of record series titles, descriptions, cutoffs, GRS references, and disposition instructions against approved records schedules. (DLAI 5015.01)

⁷ DLAM 5015.01, Volume 1, *Records Management (RM) Procedures Manual for Creating, Maintaining, and Dispositioning the Defense Logistics Agency (DLA) Records. Volume 1 - Records Management, Disposition and Evaluation*, dated September 29, 2015.

Finding 9: DLA does not consistently dispose of temporary records in accordance with DLA retention schedules.

Most of the program offices interviewed stated they have not disposed of any records and admitted they are keeping records beyond their approved dispositions. This discrepancy applies to paper records and electronic records in the various systems being used. The few program offices that are disposing of their temporary records are those utilizing the FRC for paper records storage.

DLAM 5015.01, Volumes 1 and 2, provide clear guidance, instruction, and procedures for program offices, RCs, and CROs to dispose of both paper and electronic records.⁸ Timely disposal of temporary records in accordance with approved schedules reduces the FOIA search burden on agencies and minimizes legal risk resulting from agencies retaining discoverable records that should have been destroyed.

Recommendation 9.1: With assistance from RCs and CROs, DLA program offices must identify and properly dispose of all temporary paper and electronic records that are currently on-hand and past their scheduled disposition date, in accordance with applicable records schedules. (36 CFR 1220.34(d))

Recommendation 9.2: The ARO must establish internal controls, such as periodic evaluations, to ensure records are not kept longer than their approved disposition. (36 CFR 1220.34(i))

Finding 10: Logistics Information Services, Customer Support Division, Customer Outreach Branch (J63FEA) is not creating and maintaining adequate and proper documentation of its program activities and is inappropriately using the Task Management Tracker as a recordkeeping system.

Despite having a mission that is programmatic in nature, J63FEA does not maintain any program records, and its file plan contains only administrative records. According to its mission statement, J63FEA is responsible for customer relationship management for DLA Logistics Information Services' products and services. Its functions statement lists eight major functions, all of which are programmatic and require the receipt and creation of official records in response to internal and external customers.

Staff at J63FEA are using the Task Management Tracker (TMT) system as a recordkeeping system even though it is not an authorized repository for maintaining DLA records.⁹ Staff receive tasks from the DLA Director's Action Group (DAG) through TMT and then create and

⁸ DLAM 5015.02, Volume 2, *Records Management (RM) Procedures Manual for Creating, Maintaining, and Dispositioning the Defense Logistics Agency (DLA) Records. Volume 2 - Electronic Records and Shipping Records*, dated September 29, 2015.

⁹ Task Management Tracker (TMT) is a DOD web-based solution DLA uses to manage tasks. TMT provides executive staff and action officers' task or suspense management. Tasks are assigned utilizing established organization workflow structure. DLA tasks and correspondence are entered and completed using TMT. TMT is not authorized for PII and Privacy Act documents. TMT tasks are generated for the task, but any related documents are required to be maintained off line.

send documents within TMT in response. If records documenting their work are needed, staff retrieve them from the tasker system. However, J63FEA claims that the records it creates in TMT belong to DAG and that it is the DAG's responsibility to manage them. It is likely that the records J63FEA staff create and reference within TMT are also J63FEA program records, and they need to be identified as such and managed within a suitable recordkeeping system. Program records can belong to more than one office in DLA, be used for different purposes, and must be managed.

Recommendation 10.1: J63FEA program staff must work with their RC and CRO to conduct a functional business analysis and inventory of records to determine what program records are received, created, and maintained. (36 CFR 1225(a) and (b))

Recommendation 10.2: J63FEA program staff and other DLA program offices must work with their RCs, CROs, and the ARO to establish procedures for capturing their program records from TMT to be placed into DACS-RM. (36 CFR 1222.22)

Recommendation 10.3: The RC for J63FEA must update its file plan to include all official program records received and created by office staff. (DLAI 5015.01)

PERMANENT RECORDS MANAGEMENT

Finding 11: DLA has not transferred any of its permanent electronic records to NARA.

36 CFR 1235.12 requires agencies to transfer permanent records to NARA based on the transfer dates in NARA-approved schedules. A review of DLA records schedules shows it has 20 permanent records series. A comparative review of NARA holdings showed occasional transfer of only 5 of the permanent series since 2007 in paper format. No permanent electronic records have been transferred. In addition, the lack of a complete systems inventory, as identified in Finding 15, raises the probability that more permanent records in electronic information systems have not been identified and scheduled.

Overlooking the transfer of all permanent records to NARA increases the risk of loss of permanent federal records. Delaying the transfer of permanent records no longer needed for agency purposes also increases the risk of damage and/or deterioration.

Recommendation 11.1: The ARO must identify and transfer all of DLA's permanent electronic records overdue for transfer to NARA. (36 CFR 1235.12)

Recommendation 11.2: DLA must establish internal controls to ensure all permanent records are identified, scheduled, and transferred on a consistent basis in accordance with NARA-approved records schedules. (36 CFR 1220.30(c)(1))

ELECTRONIC RECORDS MANAGEMENT

Integration of RM into information technology (IT) processes is missing some key requirements to be fully compliant with 36 CFR 1236 and Office of Management and Budget (OMB) Circular A-130.¹⁰

Finding 12: Information Operations (J6) program managers do not fully coordinate and cooperate with the RM Program.

The ARO is having difficulty getting J6 program managers to cooperate and support the RM program. The inspection team was able to witness first-hand these difficulties when the ARO and RM Program Manager attempted to schedule a meeting with the J6 office responsible for integrating RM into the design and development of information systems. Once the correct office was identified, J6 program staff were unavailable to meet during either site visit despite numerous requests for a conference by the RM program manager.

This lack of coordination between the IT and RM programs was also identified in Findings 1, 4, 13, 14, and 15 and puts DLA at risk for the improper retention or loss of records. With the majority of records being created and maintained electronically, it is vital that the IT and RM staff work together in a common purpose to create, maintain, and safeguard DLA information.

Recommendation 12: The CIO, through formal communication, must direct J6 program offices to coordinate and cooperate with, and respond to inquiries from, the ARO and RM Program Manager to ensure DLA electronic information systems and its electronic records are managed compliantly. (36 CFR 1236.6(b))

Finding 13: DLA does not involve the ARO or the RM Program Manager in the design, development, enhancement, or implementation of electronic information systems.

RM staff at DLA do not participate in any of the IT processes or reviews related to the design and development of electronic information systems (EIS) as required by 36 CFR 1236.6(b). In addition, OMB Circular No. A-130 and DOD Instruction (DODI) 5015.02, require the incorporation of RM into the design, development, enhancement, and implementation of EIS.¹¹ DLA Directive-Type Memorandum (DTM) 15-013 further requires IT systems program managers and IT staff to involve the ARO in systems development and decommissioning and in the migration of data into new EIS.¹² IT systems program managers are required to fill out and submit to the ARO DLA Form 1690, *Record Series Recommendation*, and DLA Form 1635, *EIS Appraisal*, when new and replacement systems are commissioned. But, according to the ARO, the forms are rarely received.

¹⁰ OMB Circular No. A-130, *Managing Information as a Strategic Resource*, dated July 28, 2016.

¹¹ DODI 5015.02, DOD Records Management Program, dated February 24, 2015.

¹² DLA DTM 15-013, *Electronic Records and Information Management*, dated July 22, 2016.

Involving the ARO in IT investment processes and reviews is critical for ensuring RM controls are established to ensure the reliability, integrity, usability, content, context, and structure of records and information in electronic systems (36 CFR 1236.10).

Recommendation 13: J6 must modify its IT system review processes and other relevant policies to involve the ARO in IT Investment processes to ensure compliance with 36 CFR 1236.6 (b), 36 CFR 1236.10, OMB Circular A-130, and DODI 5015.02.

Finding 14: IT system program managers do not notify the ARO or the RM Program Manager when systems are decommissioned or when data is migrated to a new system.

DLAI 5015.01 and DTM 15-013 require IT systems program managers and IT staff to notify the ARO when systems are decommissioned and when records and data are migrated into new EIS. However, despite the fact that the DLA RM Program Manager reported that the agency has eliminated as many as 600 systems in the last few years, the ARO is rarely informed when systems are decommissioned and records and data are migrated.

Failure to notify the ARO when systems are decommissioned significantly increases the risk of unauthorized disposition or other mismanagement of records. In addition, failure to involve the ARO when data is migrated into new EIS also increases the risk of records not being accessible throughout their retention period and prevents the ARO from scheduling the new systems.

Recommendation 14: J6 must modify its Systems Development Life Cycle or system decommissioning policies to ensure that IT systems program managers inform the ARO when systems are decommissioned and when data is migrated into new EIS as required by DLAI 5015.01 and DTM 15-013.

Finding 15: Information Operations (J6) does not provide the ARO with a complete inventory of electronic information systems to ensure all of DLA's electronic records in EIS are scheduled.

44 U.S.C. Chapter 35 Subchapter III, known as the Federal Information Security Modernization Act (FISMA), requires federal agencies to develop and maintain an inventory of major information systems.¹³ Section 3505(3)(C)(v) of FISMA and NARA Bulletin 2010-02 require this inventory be used as a source for the ARO to schedule electronic records.¹⁴

The ARO has periodically requested a copy of this inventory in order to comply with RM requirements for scheduling electronic records and EIS. Some of the requests resulted in a partial list, but most requests were ignored. Another request was made during the NARA RM inspection site visits, but again, only a partial list was provided to the ARO on the final day of the second site visit.

¹³ 44 U.S.C. Chapter 35, <http://csrc.nist.gov/drivers/documents/FISMA-final.pdf>.

¹⁴ NARA Bulletin 2010-02, *Continuing Agency Responsibilities for Scheduling Electronic Records*, <https://www.archives.gov/records-mgmt/bulletins/2010/2010-02.html>.

Recommendation 15: J6 must provide the ARO a copy of the complete inventory of its information systems as required by FISMA in order to schedule electronic records in EIS. (36 CFR 1236.6 and OMB Circular A-130)

Finding 16: DACS-RM RMA would be more effective with a formal implementation plan shared with all program offices.

In 2016, DLA initiated full deployment of DACS-RM, DLA's branding of a records management application software application. DACS-RM is a DOD 5015.02 Standard certified electronic RMA, which has passed the Joint Interoperability Test Command (JITC) mandatory test criteria.¹⁵ DACS-RM replaces DLA's use of its TRIM Records Management System, and DLA Finance's (J8) Electronic Document Management System (EDMS).¹⁶ TRIM and EDMS were not DOD 5015.2-STD certified nor were they configured with NARA's approved dispositions for DLA's records. Seventeen terabytes of data, which is currently undergoing verification, were migrated from TRIM and EDMS to DACS-RM in 2016.

DACS-RM will be DLA's primary repository for all official records with an established goal for enterprise-wide use by December 31, 2017. Implementation of DACS-RM places DLA on the path to meet NARA/OMB *Managing Government Records Directive* (M-12-18) Goal 1.1 to manage all permanent electronic records in an electronic format well before the established deadline of December 31, 2019.¹⁷

The program offices NARA visited were in various stages of transitioning to DACS-RM. At DLA HQ, the Human Resources (J1) Injury Compensation Office, for example, was actively working in DACS-RM using the system as part of their daily process, while most program offices had only completed their file plan structure and were preparing to move their records into the system. In the field, most program offices were awaiting DACS-RM training and managing electronic records on shared drives and in eWorks.¹⁸

The ARO and RM Program manager use an effective metrics tool developed by the CROs in New Cumberland, PA, that tracks the status of its 2,784 file plans agency-wide and the status of the migration of records into DACS-RM. In addition, the DLA Energy CRO developed their own Electronic RM Program Timeline specific to DLA Energy with clear milestones and target dates.

While these tracking tools are beneficial for tracking the status of individual component transitions, a formal implementation plan with common milestones and target dates is needed for DLA senior leaders and program managers to set goals and priorities in order to stay on track with the overall transition.

¹⁵ DOD 5015.02-STD, *Electronic Records Management Software Applications Design Criteria Standard*, dated April 25, 2007.

¹⁶ Hewlett Packard TRIM Software, <https://www.hpe.com/h20195/v2/GetPDF.aspx/c04154355.pdf>.

¹⁷ OMB/NARA *Managing Government Records Directive* (M-12-18), <https://www.archives.gov/files/records-mgmt/m-12-18.pdf>.

¹⁸ eWorks is DLA's Microsoft SharePoint portal used for collaboration and sharing of information.

Recommendation 16: A formal implementation plan with goals, milestones, and target dates for all program offices in DLA should be finalized and shared with all program offices to ensure a smooth, timely, and successful transition to the new RMA.

RECORDS STORAGE AREAS AND ROOMS

Finding 17: Inactive records in records storage rooms are not always properly identified and labeled prior to storage and are vulnerable to environmental damage.

The Disposition Services, Customer Support Directorate (J4-Battle Creek) records storage room has several very large boiler steam pipes, steam pipe valves, and water pipes running through it. Many of the shelving units for the records were leaning over under the weight of the records. None of the boxes were clearly marked nor contained disposition dates. The inactive records in this records storage room are at risk.

The ARO's records storage room is much more suitable for storing inactive records and has the capacity to store all of the J4 inactive records. However, it contains many boxes of inactive records that have passed their disposal date and many boxes that are not properly marked. Moreover, they were placed there without prior coordination with the ARO.

Recommendation 17.1: The J4 program staff, RCs, and the CRO, and the ARO, must inventory the inactive records stored in their records storage rooms to determine what records still require storage and properly dispose of records that are no longer needed in accordance with DLA RM Manual procedures.

Recommendation 17.2: The J4 inactive records that require continued storage must be moved to the ARO's records storage room or another storage area to avoid damage and deterioration from current vulnerabilities.

Recommendation 17.3: Internal controls must be established to prevent program offices from storing records in noncompliant storage rooms; to better coordinate records storage needs with applicable CROs and the ARO; and to ensure records are not kept longer than approved dispositions.

RECORDS MANAGEMENT PROGRAM STRENGTHS

There are positive RM initiatives and RM practices that may be of interest to other DOD and Federal agencies for implementation within their programs.

SENIOR LEADERSHIP SUPPORT AND RM NETWORK

DLA's Chief Information Officer (CIO) and senior leaders from DLA's components have provided strong support and resources for three key RM initiatives identified in DLA's Information Operations (J6) FY17 Annual Operating Plan: the establishment of a network of 22 full-time component records officers; the deployment of an enterprise-wide records management application; and the implementation of the General Records Schedule 6.1 Capstone approach for email management.¹⁹ The first of these achievements is particularly noteworthy as it significantly improves upon a finding made in the 1988 NARA Inspection Report and required extensive cooperation from DLA's component senior leaders. Beginning in 2015, the DLA components contributed positions to establish a centralized Records Management Program to staff its two dozen CRO positions. All the CROs have been hired under the new OPM records management 308 series and have received their Certificate of Federal Records Management Training from NARA. Feedback from the components and the CROs indicate this initiative has been very effective.

EMAIL MANAGEMENT AND ELECTRONIC COMMUNICATIONS

DLA is implementing the General Records Schedule (GRS) 6.1 Capstone approach throughout the agency. The ARO facilitated the effort, and the CIO supported it by approving policy, guidance, and implementation instructions. It was also coordinated with the DLA Office of the General Counsel (OGC) and NARA. All DLA use the same email system, Microsoft Office 365, hosted in a common operating environment that is managed by the Information Operations (J6) Directorate. The NARA Capstone verification form (NA-1005) was signed July 13, 2017.

RM TRAINING

DLA offers customized RM training to staff members according to their function in relation to records. All agency personnel and contractors are required to complete training annually and made available in DLA's Learning Management System (LMS). The LMS training covers all aspects of RM and complies fully with 36 CFR 1220.34(f). In addition to the all-staff training, the CROs are required to receive NARA RM Certification training within a year of their appointment, and RCs are required to take NARA's Basic Records Operations course within three months of their assignment. Also, the DLA CROs have developed tailored RM training for the RCs that consists of 23 modules of written and hands-on training focused on the duties and responsibilities of RCs.

¹⁹ General Records Schedule 6.1 Capstone: *Email Managed under a Capstone Approach*, <https://www.archives.gov/files/records-mgmt/grs/grs06-1.pdf>.

ACCESS AND RETRIEVAL

During site visits, nearly all DLA program offices were able to demonstrate easy access and retrieval of their records. A full list of program offices visited is in Appendix A. At DLA Headquarters, the inspection team focused mostly on access and retrieval of electronic records, as HQ is further along with its transition to a new RMA than in the regions. All of the HQ program offices were able to show that they had built temporary file structures on shared drives prior to uploading records into the RMA. Additionally, they showed the file structures in the RMA matched the shared drive structures and approved file plans. Each of the program offices was able to explain where they stood in relation to the transition to DLA's new RMA. DLA Energy did especially well providing the team with a full transition timeline and tracking sheets showing the current status for all of its program offices. The Human Resources (J1) Injury Compensation Office also provided an interesting demonstration of how it incorporated daily use of the new RMA into its Claims process for document storage and disposition. J1's innovative approach is an example from which other DLA program offices might benefit.

At Battle Creek, additional emphasis was placed on access and retrieval of paper records and demonstrations of EIS, since many of its records are in paper and most of the program offices were in the very early stages of the transition to the new RMA. Most of the offices were able to show their file structures and provide demonstrations of records in EIS. Many of the program offices were well organized, demonstrating easy access to and retrieval of their records. The Disposition Services Acquisition (J7) Directorate was especially well organized providing the team with a binder showing the full status of its entire records program including RM training certificates and completion dates for all its personnel; locations of records throughout the facility; the status of records being prepared for Federal Records Center (FRC) shipments; and location data for all of its FRC holdings. J7 stood out as model for other DLA program offices.

RM AWARENESS AND GUIDANCE

RM communications to agency personnel are very effective in creating strong RM awareness throughout the organization. DLA's ARO, in conjunction with the CROs, has produced several RM pamphlets providing guidance to all employees about their RM responsibilities, recordkeeping requirements for creating and maintaining agency records, and guidance for successful RM compliance. In addition, all incoming personnel are given an "RM Smart Book" that provides baseline RM information prior to their taking mandatory RM training. Several of the CROs meet biweekly with component senior leaders and weekly with component RCs under their purview to provide current information and to track their DACS-RM transition.

The RM program also maintains an RM website in DLA's eWorks that is accessible to all employees. The site contains links to current Federal RM requirements and NARA guidance, DOD and DLA policies and procedures, RM resources and other references, and RM points of contact for further information.

CONCLUSION

The DLA RM program has areas of strength and successful RM initiatives that may serve as examples to other Federal agencies. Among them are its deployment of an RMA to meet the M-12-18 goal for managing permanent electronic records electronically; its restructuring of CRO positions to provide RM coverage throughout the agency; its comprehensive role-based RM training program; and its excellent RM awareness activities.

However, while the DLA RM program is functioning well in many ways, there are areas of non-compliance that elevate the risk that Federal records will not be accessible when they need to be. Of particular urgency is the need to improve the management of electronic records by incorporating RM into DLA's IT processes. Better coordination and cooperation between IT and the ARO, and the establishment and enforcement of internal controls, will positively impact many areas of the RM program and minimize risk to DLA records. By making the improvements recommended in this report, the DLA RM program will further strengthen its program and help the agency achieve its mission.

APPENDIX A INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well DLA complies with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures.

METHODOLOGY

NARA carried out this inspection by conducting interviews at DLA Headquarters and Battle Creek, MI, with DLA RM and program staff and by reviewing DLA's program documentation. More specifically, the inspection team:

- reviewed records management policies, directives, and other documentation provided by DLA;
- interviewed RM representatives from the DLA records management program;
- guided the course of the inspection using a detailed checklist of questions based on Federal statutes and regulations, and NARA guidance; and
- reviewed DLA responses to current and past annual Records Management Self-Assessments (RMSA) and current and past reports of Senior Agency Official for Records Management (SAORM).

OFFICES VISITED

DLA Headquarters, Fort Belvoir, VA, 16-18 May:

- Office of the General Counsel:
 - Freedom of Information and Privacy Act Office
- Public Affairs Office
- Audits Office
- Human Resources (J1):
 - Human Resources Services, Injury Compensation
- Logistics Operations (J3):
 - Joint Contingency Acquisition Support Office (J32)
 - Mission Support Directorate (J32)
 - Management Support (J32M)
- Strategic Plans and Policy (J5)
- Information Operations (J6):
 - Strategic Vendor Management (J6TE)
 - Records Management Program Manager and Agency Records Officer (J62BM)
 - DACS-RM Demonstration
- Acquisition (J7)

-
- Finance (J8):
 - Operationalized Activities (J86) and J861 and J865
 - Energy Division:
 - Customer Operations
 - Records Storage Room:
 - Energy Division packing and temporary storage area pending FRC shipment

DLA Field Offices, Battle Creek, MI, 13-15 June 2017:

- DLA Installation Support:
 - Engineering & Environmental Services (DS-FBII)
 - Property, Plant & Equipment Management (DS-FBIP)
 - Safety & Occupational Health (DS-FBO)
- DLA Disposition Services:
 - Acquisition Directorate (J7) and Hazardous Contracting Branch East (J763)
 - Transformation Directorate (J5), Reconciliation Branch (J53), System Sustainment Branch (J53), and Assessments & Compliance Branch
 - Customer Support Directorate (J4), Useable Sales Branch, and Recycling Sales Branch
 - Operations Support Directorate (J3), Environmental Division (J33), and Demilitarization Policy Branch (J311)
 - Internal Review Office (JH-DI)
- Logistics Information Services:
 - Data Processes Division (J63FG), Characteristics Branch (J63FGD), and Federal Logistics Information System Portfolio Branch (J63FGB)
 - Customer Support Division (J63FE), Customer Outreach Branch (J63FEA), and Customer Engagement Branch (J63FEC)
 - Item Introduction & Maintenance Division 1 (J63FA), Item Introduction & Maintenance Branch 1 (J63FAB)
- Records Management Program Manager and Agency Records Officer (J62BM)
- Records Storage Rooms:
 - J4 Records Storage Room
 - Agency Records Officer Records Storage Room
 - J63FA Records Storage Room

APPENDIX B
RELEVANT INSPECTION DOCUMENTATION

Directive-Type Memorandum (DTM) 15-013, *Electronic Records and Information Management*, July 22, 2016.

DLA Instruction (DLAI) 5015.01, *Records Management*, December 17, 2012.

Draft DLAI 5015.01, *Records and Information Management*, not dated.

DLA Manual (DLAM) 5015.01, Volume 1, *Records Management Procedures Manual for Creating, Maintaining, and Dispositioning Defense Logistics Agency (DLA) Records. Volume 1, Records Management, Disposition and Evaluation*, September 29, 2015.

DLAM 5015.01, Volume 2, *Records Management Procedures Manual for Creating, Maintain, and Dispositioning Defense Logistics Agency (DLA) Records, Volume 2 - Electronic Records and Shipping Records*, September 29, 2015.

DLA Records and Information Management (RIM) Quick Guide to Records Management Compliance, not dated.

DLA Information Operations (J6) FY17 Annual Operating Plan, not dated.

Draft *Records and Information Management Strategic Performance Goals and Action Plan*, dated June 2, 2017.

Records and Information Management Program - Implementation/Sustainment Performance Goals, Objectives, Target Deliverable Dates, FY17-FY19, not dated.

RIM 2016 Program GAPS Analysis, Version 4, not dated.

Draft *Defense Logistics Agency (DLA) Records and Information Management (RIM) Performance Goals and Measurement Plan, Fiscal Year 2017, Supplement to NARA 2016 Records Management Self-Assessment (RMSA), Version 3*, not dated.

Draft *Defense Logistics Agency Records & Information Management Risk & Control*, April 2017.

DLA Records & Information Management Annual Training, Offline Version, 2016.

Draft *Records and Information Management Training Plan*, not dated.

Federal Records Centers of the National Archives and Records Administration, *Defense Logistics Agency, RG 361, Agency Profile*, March 27, 2017.

APPENDIX C

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 *Managing Government Records Directive* (M-12-18)
- OMB/NARA *Guidance on Managing Email* (M-14-16)
- Other NARA Bulletins currently in effect

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

DLA will submit to NARA a Plan of Corrective Action (PoCA) 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 DLA's action plan, provide comments to DLA on the plan within 60 calendar days of receipt, and assist DLA in implementing recommendations.

DLA will submit to NARA progress reports on the implementation of the action plan until all actions are completed. NARA will inform DLA when progress reports are no longer needed.

APPENDIX D
ACRONYMS AND ABBREVIATIONS

ADP	Automated Data Processing
ARO	Agency Records Officer
CFR	Code of Federal Regulations
CIO	Chief Information Officer
COMSEC	Communications Security
COOP	Continuity of Operations
CRO	Component Records Officer
DACS-RM	Document Automation and Content Services - Records Management
DLA	Defense Logistics Agency
DLAI	Defense Logistics Agency Instruction
DLAM	Defense Logistics Agency Manual
DOD	Department of Defense
DODI	Department of Defense Instruction
DOD -STD	Department of Defense Standard
DTM	Directive-Type Memorandum
EDMS	Electronic Document Management System
EIS	Electronic Information Systems
FISMA	Federal Information Security Modernization Act
FOIA	Freedom of Information Act
FRC	Federal Records Center
FY	Fiscal Year
GRS	General Records Schedule
JTIC	Joint Interoperability Test Command
LMS	Learning Management System
NARA	National Archives and Records Administration
OGC	Office of the General Counsel
OMB	Office of Management and Budget
PMO	Program Management Office
POC	Point of Contact
PoCA	Plan of Corrective Action
RIM	Records and Information Management
RC	Records Coordinator
RM	Records Management
RMA	Records Management Application
RMSA	Records Management Self-Assessment
RO	Records Officer
SAORM	Senior Agency Official for Records Management
TRIM	TRIM Records Management System
U.S.C.	United States Code



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