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Department of Defense
Defense Information Systems Agency
Records Management Program

Records Management Inspection Report

National Archives and Records Administration

May 18, 2020

**DEPARTMENT OF DEFENSE - DEFENSE INFORMATION SYSTEMS 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 to make improvements to their programs based on inspection findings and recommendations.

NARA inspected the records management (RM) program of the Defense Information Systems Agency (DISA) 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 DISA complies with Federal records management statutes and regulations and to assess the effectiveness of its records management policies and procedures. In particular, it focused on the management of electronic records, including email and social media communications, with emphasis being placed on policies, strategic planning, training, and oversight. Additionally, it sought to identify practices of interest to other DOD components and the wider Federal records management community.

The scope of this inspection was limited to the DISA RM program and its organizational records. While DISA's mission capabilities provide infrastructure, systems, and services to all of DOD and its components, accountability for much of the electronic records in the systems DISA maintains belongs with the individual DOD component heads, as stated in DOD Instruction (DoDI) 5015.02.²

OVERVIEW OF THE DISA RECORDS MANAGEMENT PROGRAM

In 2019, the Records Management program at DISA was realigned under the Risk Management Executive (RME)/Chief Information Officer (CIO) mission support organization and receives direct support and supervision from the Deputy CIO. For several years prior to the 2019 realignment, organizational responsibility for the RM program was varied. As such, leadership visibility into program implementation, controls, and overall management was limited.

The Records Officer (RO), assigned in January 2019, oversees a full-time contractor at the program level and provides programmatic assistance, guidance, and training to a network of Center Records Officers (CRO) and Records Liaison located in DISA's 10 Centers or equivalent,

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

² DoDI 5015.02, DoD Records Management Program, August 17, 2017.

304 Divisions and Offices, and 52 Front Offices. Bi-weekly meetings are conducted by the RO, along with periodic workshops, to disseminate information and to track progress of RM projects.

In 2016 and 2017, the DISA Inspector General (IG) conducted a Special Interest Inspection and follow-up inspection of the program to determine if DISA had NARA-compliant electronic recordkeeping to ensure transparency, efficiency, and accountability. The actions taken to bring the program into compliance and in response to the findings and recommendations in the IG reports, were completed by the RO before NARA's inspection, and was used as a guide to bring the program into compliance.

Most of DISA's records are in electronic form, maintained in various functional electronic systems, and on shared drives and in DISA's Defense Enterprise Portal Service (DEPS). Currently, DISA does not use a records management application (RMA) to maintain its electronic records, but is in the process of consolidating many of its records into a single location in the "milDrive", a cloud-based storage solution that offers more storage and reliability and better accessibility. DISA's long-term goal for managing its electronic records is to implement the Defense Enterprise Office Suite (DEOS) as mandated by the Deputy Secretary of Defense.

The following summarizes the state of RM at DISA at the time of the inspection:

- Strategic planning is being implemented in draft form, but proactive activities related to strategic planning are being adopted and implemented.
- Have implemented a robust RM dashboard application to manage compliant RM program workflows.
- Active and supported records management (RM) networks.
- Many RM policies are being updated or in draft status.
- Actively conducting records inventory projects for the compliant RM governance necessary for intellectual control.
- RM needs to be included in the system development life cycle of electronic information systems and during migration and decommissioning of systems.
- There is a compliance gap for managing DISA email according to the approved Capstone schedule.
- DISA is well positioned to support the Office of Management and Budget (OMB)/NARA *Transition to Electronic Records (M-19-21)*.³

With the recent realignment of the RM program and assignment of a new RO, several RM projects and initiatives were underway at the time of NARA's inspection to bring the program into compliance with federal regulations, improve efficiency for managing its records, and to minimize risks. NARA also acknowledges that time is needed to complete these projects and is

³ OMB/NARA Transition to Electronic Records (M-19-21), <https://www.whitehouse.gov/wp-content/uploads/2019/06/M-19-21.pdf>.

interested in being kept informed of the progress and seeing these projects completed.

Even with the current momentum taking place at DISA, more progress needs to be made. This report makes 5 findings and 9 recommendations that will assist DISA in mitigating the risks to records, bringing their RM programs into compliance.

FINDINGS AND RECOMMENDATIONS

RECORDS SCHEDULING REQUIREMENTS

Finding 1: There are unscheduled records in the organization and in electronic information systems (EIS).

36 CFR 1224.10(a) requires Federal agencies to ensure Federal records are scheduled. This requirement applies to records in any medium.

In February 2019, DISA initiated a full inventory of all records in the entire organization with the goal of updating file plans, identifying unscheduled records to schedule, and updating the DISA Records Disposition Schedule (RDS). This inventory is the first phase of a project that will be followed by another inventory of DISA's electronic records in its electronic information systems (EIS). At the time of the inspection, the RO and her staff were verifying the inventory responses from approximately 170 offices before submitting proposed dispositions to NARA for unscheduled records and updating their RDS. Completion of this project, including the phase 2 inventory and subsequent scheduling of records and systems, will bring DISA into compliance with several 36 CFR requirements.

Recommendation 1.1: The RO must complete the verification of the inventory and submit requests for disposition authorities to NARA for any unscheduled records and for any changes to existing dispositions. (36 CFR 1225.12 and 1225.22 (h))

Recommendation 1.2: The RO must initiate and complete the inventory of EIS and submit requests for disposition authorities to NARA for EIS that contain electronic records. (36 CFR 1225.10 and NARA Bulletin 2010-02)

Recommendation 1.3: The RO must update its RDS with missing dispositions and unscheduled records and disseminate the final RDS within the organization. (36 CFR 1226.12 (a))

ELECTRONIC RECORDS MANAGEMENT REQUIREMENTS

OMB/NARA *Transition to Electronic Records* (M-19-21) requires all Federal Executive Branch agencies to take steps to ensure all records are created, retained, and managed in electronic formats, with appropriate metadata. DISA, being mainly an electronic systems driven agency, is positioned to support M-19-21. DISA has started many RM compliance improvement initiatives and M-19-21 will provide them with the necessary support to move towards fully compliant electronic recordkeeping. However, there are a few important areas that need to be addressed.

Finding 2: RM is not incorporated or integrated into DISA IT processes for EIS.

36 CFR 1236.6(b), OMB Circular A-130, and DODI 5015.02 requires the integration of RM and preservation considerations into the design, development, enhancement, and implementation of EIS.

Currently, the RO is not involved, nor has RM been integrated into DISA IT processes for the design, development, and implementation of EIS, including the migration of records into newer systems. While the RO and IT are aware of each other's roles, IT relies on functional and system program managers to inform them if the systems they are responsible for contain records, and if the records are scheduled or unscheduled. There is no process, procedure, or controls in place to ensure the RO is informed of EIS containing records or when records are migrated from one system to another, other than the System of Records Notices (SORN) process when EIS contain Personally Identifiable Information (PII).

Failure to comply with this Federal, OMB, and DOD requirement places electronic records at risk for loss or unauthorized disposition, which increases the agency's risk to potential fines, lawsuits, and penalties as well as Congressional and media attention. An example of the risk to records was highlighted when the inspection team learned that the information in DISA's current Task Management Tool (TMT) contains tasks migrated from the last version of the DISA Task Management Tool (DTMT) going back to 2015 only. The tasks in the older system, the Action and Information Management System/Tool (AIMS), were not migrated into DTMT or TMT, and no one interviewed knew where the older tasks were. The current RO and TMT task managers were not in these functional positions, and therefore not involved in any of the 2015 migration efforts.

Recommendation 2.1: The RO must work with their IT to involve the RO and incorporate RM into its IT investment processes for the design, development, enhancement, and implementation of EIS to ensure compliance with OMB Circular A-130 and DODI 5015.02. (36 CFR 1236.6(b))

Recommendation 2.2: The RO, working with the TMT team and IT, must investigate the deletion of older tasks and associated unstructured electronic records not migrated to determine proper disposal and if an unauthorized disposal occurred. (36 CFR 1230.3)

Finding 3: There is a lack of procedures and internal controls for managing electronic records to prevent loss or unauthorized dispositions.

36 CFR 1220.30 (c)(1), 1222.34, and 1230.10 (c) require the development of procedures and controls to manage and protect records, and to prevent against unauthorized addition, deletion, alteration, use, and concealment.

As stated above, DISA currently does not use an RMA to manage its electronic records but does plan to implement DEOS once it is made available. Electronic records were being kept on personal hard drives, shared drives, SharePoint, and in various EIS including TMT and Defense Enterprise Email (DEE). The current lack of an RMA makes it especially important that procedures and controls are in place to ensure access and to prevent loss or unauthorized disposal.

At the time of the inspection, DISA announced an enterprise-wide migration of all documents, including records from hard drives, shared drives, and SharePoint to the milDrive. This consolidated move is a positive step for managing electronic records and provides efficiencies for improving legal and Freedom of Information Act (FOIA) records searches. The need, however, to develop and implement procedures and controls is still necessary, especially for managing permanent electronic records in the milDrive. The procedures and controls will also allow DISA to better organize the records, potentially minimize issues and facilitate its eventual migration into DEOS.

Recommendation 3: The RO, working with IT, must establish procedures and controls to ensure electronic records are maintained and accessible throughout their lifecycle, and deleted only in accordance with NARA-approved retention schedules. (36 CFR 1220.30 (c)(1), 1222.34, and 1230.10(c))

Finding 4: Current email management practices and technologies do not secure all temporary record email from potential loss.

36 CFR 1236.22 (a) requires agencies to issue instructions for managing electronic mail records.

DISA uses the DEE system for its email service. In October 2015, the DEE program office began enforcing an inbox storage limit of 512 MB for all basic users, and 4 GB storage limit for all business users. DEE customers that exceed their storage limit are advised to follow their agency's policy for storing email still required for business purposes.

DISA has adopted NARA's General Records Schedule (GRS) 6.1, *Email Managed Under a Capstone Approach*, for senior DISA officials emails that are considered permanent and kept within DEE using its journaling capabilities.⁴ In addition, as part of its Capstone schedule, the emails of all other DISA personnel are temporary and kept for seven years. The temporary emails, however, are not managed or controlled by the DEE system and are left up to DISA personnel to manage on their own.

The seven-year retention of temporary email for all non-Capstone officials, combined with the limited storage DEE imposes, requires personnel to create personal storage table (PST) files that are kept on personal hard drives or shared drives in order to maintain temporary email. Currently, implementing instructions or controls do not exist for personnel to properly manage temporary email. Personnel can create as many PST files as they would like and keep them wherever they want, which increases the risk for potential loss, corruption of PST files that are not backed up, and unauthorized deletions.

As part of the Capstone Approach, agency ROs are required to provide agency personnel with new implementing instructions for managing temporary email, including when to dispose of email under the approved Capstone records schedule.

⁴ NARA GRS 6.1: *Email Managed under a Capstone Approach*, <https://www.archives.gov/files/records-mgmt/grs/grs06-1.pdf>, September 2016.

Recommendation 4.1: The RO, with guidance from the CIO, must develop and implement the necessary policies, procedures, and controls to ensure temporary email is preserved and available in accordance with its Capstone records schedule. (36 CFR 1220.34(i))

Recommendation 4.2: The RO, working with the Deputy CIO, must determine whether the loss, corruption, or unauthorized dispositions of temporary emails in PST files have occurred and report the results to NARA. (36 CFR 1230.14)

PROGRAM MANAGEMENT REQUIREMENTS

Finding 5: DISA’s strategic plans, directives, instructions, and policies are out of date or in draft form.

DISA developed a draft RM Strategic Plan containing several goals to meet the requirements of OMB/NARA Directive M-12-18, *Managing Government Records*, prior to its replacement by OMB/NARA M-19-21 released in June 2019. DISA’s plan lays out four phases: Phase 1, Identify DISA Records; Phase 2, Develop RIM Policies, Strategies, and Procedures; Phase 3, Electronic Records Management; and Phase 4, RIM Sustainment and Ongoing Actions to bring the DISA RM program into compliance with meeting OMB and NARA directives. Although the Strategic Plan is still in draft, several projects for the phases have begun and progress is ongoing. DISA needs to complete the coordination process and finalize the plan as it already serves as a guide by which DISA is making improvements to the program to meet OMB and NARA requirements.

One of the projects for Phase 2 of DISA’s RM Strategic Plan led to the recent revision of several RM policies: Permanent Records Management in Electronic Format; Records Management Policy; and Removable Media, External Hard Drives, Flash Media, and miCloud Storage Service. In addition, three key RM documents were revised issuing updated RM guidance for DISA Senior Leaders, Managers and Supervisors, and all DISA Employees. Several other RM policies are currently under revision for the records scheduling process, conducting evaluations, electronic records migration and metadata, and social media records. Another key document, also under revision, is DISA Instruction 210-15-6, Records Management, which encapsulates many of these policies into a single RM directive. DISA needs to complete the revisions and issue the remaining RM policies and instruction.

A successful records management program has an established governance framework and communicated policies in place. Agency-wide directives and policies must inform all personnel who create, receive, access, or use Federal records of their records management responsibilities (36 CFR 1220.34(c)). Policies should be developed with all relevant stakeholders and must address the requirements of the Federal Records Act⁵, 36 CFR Chapter XII Subchapter B⁶, and other relevant guidance issued by NARA and OMB, such as OMB Circular A-130.

⁵ 44 U.S.C. Chapter 31, Federal Records Act, <https://www.archives.gov/about/laws/fed-agencies.html>.

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

Having current, approved RM directives and policies is essential to the success of any RM program and for providing guidance on the management of permanent records. Some of the RM directives, policies, and/or procedures submitted to NARA, while containing requirements for the management of permanent records, were outdated or in draft form. This is a very common finding among Federal agencies. DISA is aware of the need to update their directives, policies, and manuals, and have proactively started the process.

Recommendation 5: DISA must create and/or update comprehensive RM policies and directives covering the management of all records. (36 CFR 1220.34(c))

NOTEWORTHY PRACTICES

During the site visits, a couple of noteworthy practices were found that would be of interest and benefit to other DOD components and Federal agencies.

DISA APPLICATION FOR RECORDS MANAGEMENT (DARM)

The RM program at DISA spans over 16,000 DISA employees and many disparate international locations. Given this broad scope of responsibility, and working with limited resources, DISA has developed and implemented a web-based RM dashboard (DaRM) in SharePoint that has a good marketing program and senior level support. The DaRM application is built on the DoD Enterprise Portal Service (DEPS). DaRM was developed to provide policy and guidance to DISA programs and conduct RM services between the DISA RM program and the RM network. Currently, DaRM is used to manage records inventory projects and general outreach and communication of RM policy and procedures. DaRM also contains workflow processes to manage file plans and approved RM network roles at DISA. Finally, DaRM contains an RM repository for work group meeting minutes, templates, and instructions. Future uses include collecting necessary data (using forms) for the RM program. The RO was able to leverage internal DISA relationships and application development resources without issuing any new contracts or budget allocations to develop and implement DaRM.

RECORDS INVENTORY

As part of the DaRM, DISA initiated a full agency unclassified records inventory using forms developed in DaRM, during February 2019, to update file plans, identify new records to schedule, and update DISA's Records Disposition Schedule (RDS). The DISA RM program provided training for conducting the inventory. This initial inventory received a little over 170 inventory responses, which is currently being analyzed and validated. The RO will be updating record schedules as a result of this effort. This initial inventory did not include conducting an electronic systems inventory, but some systems were reported. The RO is in the late planning stage to implement a complete electronic systems inventory. Although this inventory effort did not currently include classified records, NARA wanted to highlight this proactive and well planned and supported RM function that is a foundational element for building a compliant RM program.

CONCLUSION

The comprehensive management of electronic records is a big challenge, but DISA has taken positive steps and is making progress towards this goal. The completion of the DISA RM instruction and remaining policies, along with the development of procedures and controls for managing electronic records, will help DISA better manage its electronic records. In addition, partnering with IT to involve the RO and integrate RM into its IT processes will help minimize the risks to its electronic records. Despite the challenges, the Deputy CIO and the RO have initiated a number of projects and initiatives to bring the RM program into compliance and have developed some promising practices worthy of sharing with the other DOD components and Federal agencies.

The recommendations in this report are made to correct areas of the RM program that are not compliant or partially compliant, to minimize the risks to Federal records, and to ensure they are readily accessible to support mission-essential functions. They are intended to help DISA comply with Federal RM statutes and regulations and ensure that the agency is accountable to Congress and the public. Follow-up actions required for DISA and NARA are included in Appendix C.

APPENDIX A

INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well DISA 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 visiting the DISA Headquarters at Fort Meade, MD, 19-20 November 2019 and interviewing the DISA Records Officer, the DISA Deputy CIO, and other DISA officials. In addition, the inspection team:

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

OFFICES VISITED/INTERVIEWED

- Deputy CIO and Agency Records Officer
- Office of the General Counsel and the Office of the Inspector General
- Task Management Tool Team
- Services Development Directorate
- Workforce Services Directorate

APPENDIX B

RELEVANT INSPECTION DOCUMENTATION

Revised “DISA Strategic Approach to Records Management,” not dated.

DISA Instruction 210-15-6, “Records Management,” 20 November 2012.

DISA Instruction 630-50-2, “Removable Media, External Hard Drives, Flash Media, and milDrive Cloud Storage Service,” 19 November 2019.

“OCIO RM Mission and Functions,” not dated.

DISA and JFHQ-DODIN Policy Letter 2019-1, “Permanent Records in Electronic Format,” 17 April 2019.

DISA/JFHQ - DODIN Policy Letter 2018-7, “Records Management,” 28 June 2018.

Draft DISA “RM Program Standard Operating Procedures,” November 2018.

Draft DISA “Records Scheduling Process and Procedures,” last updated 28 October 2019.

Draft DISA “Records Disposition Schedule,” not dated.

Draft DISA “RIM Program Evaluation Strategy and Process,” not dated.

Draft DISA “Electronic Records, Migration Strategy, and Metadata,” not dated.

Draft DISA “Social Media Policy Insert to Handbook,” 30 October 2019.

DISA “Social Media Handbook,” 9 April 2014.

DISA “Office of the General Counsel’s DEE Search Guide,” 6 July 2018.

DISA “DEE Tactics, Techniques, and Procedures, Requesting and Conducting a Legal Search and Hold of DEE Email,” 19 March 2019.

“Records Management Guidance for DISA Senior Officials,” July 2018.

“Records Management Guidance for DISA Managers & Supervisors,” January 2019.

“Records Management Guidance for New Employees,” October 2018.

IG Memorandum for the Director, DISA, “Special Interest Inspection of the DISA RM Program,” 10 November 2016.

IG Memorandum for the Director, DISA, “Follow-up Special Interest Inspection of the DISA RM Program,” 10 August 2017.

DISA Instruction 630-85-2, “Follow-up on Government Accountability Office (GAO) and Inspector General (IG) Assessments in DISA,” 12 December 2017.

“OC’s RM Testing Summary,” 29 March 2019, and related OC 19 MICP Test Grid RM.

DISA “Records Management Training,” 2019.

DISA “Records Inventory Training for Records Liaisons,” 2019, and multiple Class Rosters from January and February 2019.

DISA Dateline article, “DISA’s new cloud-based storage solution enables secure access to data anywhere, anytime,” 26 March 2019.

Multiple DISA “Dateline” articles regarding RM announcements, multiple dates.

Multiple Organization Charts, multiple dates.

Draft Deputy Secretary of Defense Memorandum, “Designation of Defense Enterprise Office Solution as an Enterprise Service,” not dated.

DEOS Information, “Records Management Requirements Summary,” May 2019.

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 *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

DISA will submit to NARA a Plan of Corrective Action (PoCA), to include applicable findings and recommendations, 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 DISA on the plan within 60 calendar days of receipt, and assist DISA in implementing recommendations.

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

APPENDIX D

ACRONYMS AND ABBREVIATIONS

CFR	Code of Federal Regulations
CIO	Chief Information Officer
DaRM	DISA Application for Records Management
DEE	Defense Enterprise Email
DEOS	Defense Enterprise Office Suite
DEPS	Defense Enterprise Portal Service
DISA	Defense Information System Agency
DOD	Department of Defense
DODI	Department of Defense Instruction
DITPR	Defense Information Technology Portfolio Repository
EIS	Electronic Information System
FOIA	Freedom of Information Act
GRS	General Records Schedule
HQ	Headquarters
IRM	Information Resource Management
IG	Inspector General
IT	Information Technology
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
PoCA	Plan of Corrective Action
PST	Personal Storage Table
RM	Records Management
RO	Records Officer
SAORM	Senior Agency Official for Records Management
SORN	System of Records Notice
TMT	Task Management Tool
U.S.C.	United States Code



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