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Records Management Program

Records Management Inspection Report

National Archives and Records Administration
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**DEPARTMENT OF DEFENSE - DEPARTMENT OF THE ARMY
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 program of the Department of the Army (DA) as part of a multi-year plan to inspect the records management programs of the Department of Defense (DoD) components. The purpose of this inspection was to examine how well the DA complies with federal records management statutes and regulations and to assess the effectiveness of its records management policies and procedures. The engagement emphasized the coordination of records management program implementation across the DA including elements of the Headquarters, Department of the Army (HQDA), Army Commands (ACOM), Army Service Component Commands (ASCC), and Direct Reporting Units (DRU). The focus of the inspection was on planning, policies, training, electronic records, permanent records, and the oversight of history and museum collections. Additionally, it sought to identify practices of interest to other DoD and DA components and to the wider federal records management community. (See Appendix A for a list of participating organizations within the DA.)

The DA records management program is in the midst of a rebuilding effort and faces difficult challenges to sustain a compliant records program as part of wider Army modernization strategies. Among these challenges are leadership support for records management activities, staffing issues, budgetary issues, and improving coordination and communications. As one of the largest programs in DoD, the DA records management program requires the full support of Army leadership as it works to find innovative solutions to meet the demands of records management in a rapidly changing operational environment. To assist the DA in meeting these needs this report makes 14 findings and 40 recommendations. There is also a section listing some noteworthy practices in the DA records management program.

OVERVIEW OF THE DA RECORDS MANAGEMENT PROGRAM

The Army records management directorate (ARMD) reports to the Office of the Chief Information Officer (OCIO). The function of the ARMD is to provide oversight for Army records management operations, develop regulations, guidance, and training for approximately 1.5 million uniformed and civilian personnel. To accomplish this mission ARMD has 13

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

assigned personnel operating in two branches: Scheduling and Continuity of Operations, and Training and Assessment. The Army Records Officer (ARO) provides oversight to the program and reports to the Director of the ARMD. The Army Chief Information Officer (CIO) serves as the Senior Agency Official for Records Management (SAORM).²

The implementation and oversight of records management functions at HQDA, ACOMs, ASCCS, and DRUs is conducted by Records Administrators (RA) who are appointed in writing. Presently, there are 55 RAs who have operational control over records management in their units. Typically, they are assisted by Records Managers (RM) who can be placed at Major Subordinate Commands (MSC) or independent commands. Among individual units Records Coordinators (RC) are responsible for day to day records operations such as the use of the Army Records Information Management System (ARIMS) and the creation of office records lists (ORL). With the exception of staff at the ARMD program, most RAs, RMs, and RCs, collectively known as records management officials (RMO), are assigned collateral duties within their commands.

RECORDS MANAGEMENT PROGRAM CHALLENGES AND STRENGTHS

ARMD faces numerous challenges including the need to modernize records management throughout Army offices, commands, and units to meet the requirements for daily recordkeeping as well as help ensure operational success of the service as an element of future multi-domain operations (MDO).³ The most serious is the erosion of support for the importance of records management within the Army. In several instances senior leaders expressed the view that records management was not a pressing concern since artificial intelligence would resolve long standing program difficulties. The erosion of support for ARMD is demonstrated by the elimination of many records management positions as part of administrative personnel cuts (between 10-30%) within numerous offices, commands, and units. For staff who remain, administrative duties, in addition to records management, have multiplied. The transition of the management of all administrative and operational records to electronic formats along with the expanding volume of applications, data, and IT systems places an increased training and knowledge burden on records management staff to ensure the success of their programs. In addition, records management staff are burdened by DA initiatives to move massive amounts of unstructured electronic records to the cloud utilizing Microsoft Office 365 (commonly known as Army 365 or A365). The movement of these records has not involved coordination with ARMD creating risks to records as they transition to the Army cloud (cArmy). This also impacts the ability to effectively manage these records in the new environment and presents risks to the presentation of data and information to decision makers. To address the challenges that face the Army records management program, the current Director of ARMD and the ARO must reform, rebuild, and modernize the program.

² The Army CIO position is currently vacant. The Chief Data Officer (CDO) is temporarily assigned as the Army SAORM.

³ Multi-domain operations include land, sea, and air using combined arms as well as all domains, including cyber, space, and the electromagnetic spectrum.

The strength of the current program is that both the Director and the ARO bring a strong commitment to the proper management of records and a desire to see the return of a robust records program to the DA. The ARO has several initiatives that are addressing challenges to the program, and which are increasing the visibility and viability of ARMD including:

- Update Army records management regulations
- Retool records management training making it mandatory for all personnel
- Oversee, update or replace ARIMS
- Increase coordination and communication with RAs / RMs throughout the Army
- Review Army records schedules
- Integrate records management into systems development
- Conduct reviews electronic information systems (EIS) to schedule them
- Involve records management in the implementation of A365 with updated records keeping requirements throughout the Army.
- Inventory and disposition legacy analog and electronic records

The scope of work completed by the ARO and her staff is impressive, yet there is much to be done that will require the full support of Army leadership from the very top of the DA all the way down to the individual soldier or civilian.

FINDINGS AND RECOMMENDATIONS

The findings and recommendations in this report are intended to support the ARMD in its efforts to reform the Army records management program to bring it into line with current efforts to reshape the DA to meet the challenges of MDO. In tandem with efforts to achieve a digital transformation, the Army must also focus on a records transformation and the symbiotic relationship between records management, data management, systems management and knowledge management collectively known as information management. Records form the building blocks for information management and the effective use of that information in a variety of settings from daily correspondence to battlefield decision-making. The failure to capture, maintain, and disposition records properly entails significant risk to the Army. The following findings outline these risks and make recommendations to address current and longstanding problems with Army recordkeeping.

RM PROGRAM ADMINISTRATION AND SUPPORT

A key element for the success of a records management program in an organization as large and complex as the DA is leadership support and planning for the implementation of the program. Without this support the DA risks the following:

- Program inefficiency and diminished accountability
- Loss of program continuity
- Loss of program support
- Program deficiencies cannot be readily identified and corrected
- Inability to access information for mission critical or operational purposes
- Increased operational costs
- Increased legal costs

Finding 1: Army and federal records management regulations do not receive active leadership support to be fully implemented throughout the DA.

44 U.S.C. 3102, Chapter 31- Records Management by Federal Agencies, requires the head of each agency to ensure that resources are allocated to effectively implement records management laws and regulations. Additionally, Army Regulation AR-25-400-2 charges the Secretary of the Army to establish, sufficiently resource, and maintain an Army records management program.⁴ To fulfill this charge, records management duties are assigned to leadership throughout the HQDA, ACOMs, ASCCs, and DRUs. To oversee the implementation of the Army records management program, the Army CIO is designated as the SAORM.⁵ The active engagement of leadership with records management and ARMD is essential to Army's plan to modernize its business practices to bring them into the information age. Despite the charge of AR-25-400-2, it was found that records management was seen as a low priority by leadership in many offices, commands, and units.

Among the twenty-five components interviewed for the inspection, significant concerns were expressed by RMOs about leadership support for records programs. RAs in many components felt that the importance of recordkeeping has diminished over time and is no longer viewed as a key element of information management by senior leaders. Many felt that leadership did not see the value of good records management and were not concerned with implementing strong programs. As a result, programs were poorly staffed and records were not maintained in a manner to inform the effective and efficient management for decision-making at all levels. Rather than maintain records management staff and improve recordkeeping to manage the increasing volume of information from electronic files, applications, and systems, many leaders are willing to risk non-compliance with Army and federal records management regulations to address challenges in other mission areas.

To meet the future operational needs of the DA the role of records management must be reviewed and revitalized by the SAORM in association with leadership in offices, commands, and units across the Army.

Recommendation 1.1: The DA must update the responsibilities and authority of the SAORM in AR-25-400-2 to ensure they meet the expectations of NARA Bulletin 2017-02 to promote effective records management throughout the Army. (NARA Bulletin 2017-02, Office of Management and Budget (OMB) Circular A-130, and AR-25-400-2)

Recommendation 1.2: The SAORM must ensure through policy or oversight that commanders and officials in HQDA, ACOMs, ASCCs, and DRUs implement records management policies. (36 CFR 1220.30 and AR-25-400-2)

⁴ AR-25-400-2, Army Records Management Program, October 18, 2022.
https://armypubs.army.mil/epubs/DR_pubs/DR_a/ARN31479-AR_25-400-2-000-WEB-1.pdf.

⁵ SAORM duties are defined in NARA Bulletin 2017-02.

Finding 2: OCIO and ARMD do not have a comprehensive strategic plan that integrates records management into the DA mission.

36 CFR 1222.26(e) requires policies, procedures, and strategies for ensuring that records are retained long enough to meet programmatic, administrative, fiscal, legal, and historical needs as authorized in a NARA-approved disposition schedule. OMB Circular A-130 includes specific requirements related to strategic elements of records management programs that are to be included in an agency's Information Resources Management (IRM) Plan.⁶ In addition, NARA Bulletin 2017-02 lists one of the responsibilities of the SAORM as setting the vision and strategic direction of the agency records management program.⁷

Charged with managing the records needs of the largest component of the DoD, ARMD is not approaching the task strategically to set program objectives with achievable goals. The DA records program must meet the rapidly changing electronic records environment and be reintegrated into daily operations of the Army. To meet this challenge ARMD should have a plan that emphasizes the importance of the program to the DA and which integrates it into MDOs. A strategy that includes a coordinated review of the role of records management in the areas of administration, information technology (IT) systems, knowledge management, and data collection is essential to increase the efficiency of recordkeeping, enhance readiness, and support Army operations. Coordination of planning with other related areas such as cybersecurity would ensure further integration of essential information resources throughout the DA.

Without strategic planning for records management the DA, OCIO, and ARMD will continue to face challenges to identify and address long-term problems in Army recordkeeping. These problems impact daily records management as well as the information collection requirements of commanders in an operational environment.

Recommendation 2.1: The SAORM, ARMD, and the ARO must establish a strategic plan for the Army Records Management program that outlines goals and objectives that will enable records management to meet the needs of the Army in an electronic recordkeeping environment. (36 CFR 1222.26(e) and OMB Circular A-130)

Recommendation 2.2: The SAORM, ARMD, and the ARO must revise records procedures to include other data and information governance and management organizations, such as knowledge management (KM), information technology, CIO organizations and Chief Data Officers. (36 CFR 1222.26(e) and OMB Circular A-130)

⁶ OMB Circular A-130: *Managing Information as a Strategic Resource*, https://www.whitehouse.gov/wpcontent/uploads/legacy_drupal_files/omb/circulars/A130/a130revised.pdf.

⁷ NARA Bulletin 2017-02: *Guidance on Senior Agency Officials for Records Management*, <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02.html>.

Finding 3: The DA does not routinely assign and maintain adequate personnel resources to effectively manage and oversee the records management program.

36 CFR 1220.34(d) requires agencies to assign records management responsibilities in each program (mission) and administrative area to ensure incorporation of recordkeeping requirements and records maintenance, storage, and disposition practices into agency programs, processes, systems, and procedures. DA-PAM-25-403 requires HQDA, ACOMS, ASCC, and DRUs to appoint RAs, RMs, and RCs in writing at appropriate levels in each command or unit.⁸

In practice RAs oversee records management operations in their commands or units and often serve as subject matter experts. They ensure the appointment of RMs in MSCs or units and track the appointment of RCs at the office or unit level. RA duties as spelled out in DA-PAM-25-403 encompass twenty-six separate responsibilities along with oversight of the program. RAs are the backbone of a successful records management program in the Army but the position is overburdened and understaffed in many offices, commands, and units.

It was rare for the RAs interviewed to have records management as a singular duty; most had three or more collateral duties, some had over ten. It was typical for one RA to have charge of records management for an ACOM with multiple MSCs, hundreds of offices, and thousands of personnel. At several commands RA positions went unfilled for significant periods of time. It was common for a RA to be appointed after a vacancy of over a year or more. In one instance the position had been vacant for 7 years. Most RAs reported that there was no transition from their predecessors and many had to restart their programs from scratch. In very few instances did the RA have staff support while many reported difficulties appointing and maintaining RMs and RCs throughout their commands and units.

In lieu of dedicated staff, RAs should be supported by RMs and RCs in their offices, commands, and units. Like RAs, RMs have multiple responsibilities on top of collateral duties. Their responsibilities entail more day to day oversight of records matters and the management and training of RCs. Both RM and RC positions frequently turnover with uniformed personnel often transferring to a different unit shortly after they were trained. There was no directive or common practice for filling RM positions at MSCs or subordinate units while in some instances positions simply were not staffed either at the RM or RC level.

The failure to adequately staff records management programs places a difficult burden on RAs to manage records throughout their organizations leading in many cases to a sense of resignation about the ultimate effectiveness of their programs. Failure to replace and train staff in a timely manner also results in the loss of program control and oversight with the corresponding necessity to review and restart program operations on a frequent basis.

Recommendation: 3.1: The DA must assign records management responsibilities throughout HQDA offices, ACOMs, ASCCs, DRUs, and other independent organizations to ensure incorporation of recordkeeping requirements into agency programs, processes, systems, and procedures. (36 CR 1220.34(d) and DA-PAM-25-403)

⁸ Department of the Army Pamphlet 25-403, November 10, 2022.
https://armypubs.army.mil/epubs/DR_pubs/DR_a/ARN37392-PAM_25-403-001-WEB-2.pdf.

Recommendation 3.2: The DA should review staffing requirements for RMOs in HQDA offices, ACOMs, ASCCs, and DRUs to ensure adequate staffing of the records management program.

Finding 4: The Records Retention Schedule-Army (RRS-A) is difficult to use and outdated.

36 CFR 1224.10(a)(c) charges agencies to schedule records, review them regularly and update them if necessary. 36 CFR 1225.22 describes circumstances when scheduled records need to be rescheduled and states that every five years, agencies must review all records schedules that are ten years old and older, based on the date that NARA approved the schedule.

Records retention schedules are the building blocks for information management and provide the legal structure for the retention, maintenance and destruction of records. Without continuous schedule reviews and updates the Army incurs numerous organizational risks including:

- Operational inefficiency
- Poor decision making
- Failure to protect the legal interests of institutions and people
- Failure to document historical actions
- Failure to comply with federal and Army records management regulations

ARMD has five staff members assigned to schedule and review records. Currently, the Records Retention Schedule–Army (RRS-A) contains over 6,000 individual records numbers managed by a filing system that has not been updated since the 1990s.⁹ Many of these individual records series are in urgent need of review as the DA pursues cloud-based records initiatives and transitions to an MDO-capable force. This is a monumental task. Of the over 1,300 active Army schedules registered by the National Archives, almost 800 were approved prior to 1990 to schedule analog records.¹⁰ Most schedules require a review to determine their continuing relevance to Army operational needs now and in the future. To add to this scope of work there are a number of legacy analog records series in federal records centers that remain unscheduled after decades of effort. This includes 11,000 cubic feet of court martial files as well as 4,000 cubic feet of U.S. Army Corps of Engineers files. There are also over 13,000 cubic feet of garrison and post records from World War II and later in reappraisal pending status.

In addition to the scheduling requirements for analog records, ARMD has to schedule a significant number of EIS. These systems are listed in the Army Portfolio Management System (APMS), which is used to track IT investments. As of November 2022, there were over 5,000 systems or data sets listed in APMS, many of which need to be reviewed by ARMD for scheduling purposes. In a number of cases, these reviews require a secondary review to ensure the proper application of previously approved analog schedules to the systems.

⁹ RRS-A still utilizes file codes based primarily on Army Regulations as formulated for the Modern Army Recordkeeping System (MARKS) in the 1990s.

¹⁰ Only schedules approved since 1973 are in the NARA records control schedule repository. The Army still uses schedules from the 1960s that are not in the RCS.

The modernization of RRS-A is of critical importance to the Army. The need for a thorough review of records schedules to streamline them for current and future Army operations cannot be overstated while continuing efforts to implement a convoluted and complex records schedule hamper efforts to move recordkeeping to a cloud environment.

Recommendation 4.1: ARMD must develop a plan to review and update all records schedules. (36 CFR 1224.10(a)(c) and 36 CFR 1225.22)

Recommendation 4.2: ARMD must create and implement a plan to schedule its backlog of unscheduled records in a timely manner in accordance with federal regulations. (36 CFR 1220.10(a)(c) and 36 CFR 1225.22)

Recommendation 4.3: OCIO and ARMD must review the configuration of the RRS-A to ensure it provides effective controls over the creation, maintenance, and use of records in the conduct of current business. (36 CFR 1220.30(c1))

Finding 5: Wartime and contingency operations (CONOPS) records are not consistently scheduled, collected, transferred and maintained as required by Army and federal policy and regulations.

AR-25-400-2 requires that Army commanders ensure that wartime and CONOPS records are created and preserved to document operational activities and protect the rights and interests of soldiers and civilians. DA-PAM-25-403 provides instructions that commanders will create records management plans that contain specific procedures for creating, identifying, harvesting, and transferring operational records information. At a minimum these plans should include the assignment of RMs or RCs, an approved office ORL, records collection points, along with harvesting and transfer instructions.

RMOs along with ARMD and the staff of several commands expressed concern about the collection and retention of unit wartime and CONOPS records and the application of schedules to these records. Detailed records guidance for commanders in the field was last issued in 2009 and includes dated information regarding the capture and transfer of records to ARMD. Records created in CONOPS situations are all considered permanent and should be secured by the units. These are the official records of unit operations and should be uploaded into ARIMS or transferred to hard drives prior to transfer to a unit's home command. However, in practice, wartime or CONOPS records collection is much more complicated. In some instances, unit records are transferred to Military History Detachments (MHD) due to the lack of knowledge of procedures. Over time the Center for Military History (CMH) has come to be viewed as the records repository for wartime and CONOPS records with the creation of systems such as Army Historical Resources Online (AHRO), which stores records from the global war on terrorism.¹¹

¹¹ Secretary of the Army Memorandum, *Collection of U.S. Army Records From Operation Enduring Freedom, Operation Iraqi Freedom and Operation New Dawn*, July 1, 2013.

Contingency records were also collected by U.S. Army Central Command (ARCENT) and stored at Shaw Air Force Base following an operational order in 2016 that theater records managers (TRM) collect all long-term and permanent records residing on all networks as well as EIS or systems of records not on the primary networks of deployed units. TRMs were also directed to capture the emails of officers the rank of colonel and above. Units desiring copies of their records were directed to request hard drives to transfer them to their home stations.

Administrative records were to be uploaded into ARIMS by records management personnel at Shaw AFB upon receipt.¹² While intended to ensure the capture of contingency records, the operation order also created the potential for duplicate records to be retained by individual units. The work of the CMH, ARCENT, and other offices and commands involved in the capture of wartime and CONOPS records has not been coordinated with ARMD to any significant degree to create a repeatable procedure throughout the DA. Specifically in instances where operation orders result in the successful collection of records, ARMD should be notified to make changes and improvements to the instructions in DA-PAM-25-403 or an updated guide for combat commanders.

As far back as 2010 the Army Records Management and Declassification Agency (now ARMD) proposed to resolve the issue of decentralized and broken war record keeping processes by working with Joint Staff Combatant Commands (COCOM) to develop functional schedules that would provide a holistic view of an entire contingency operation. Thirteen years later ARMD still needs to engage with COCOMs, Army offices, commands, and units to review wartime and CONOPS schedules to ensure that records categories developed over the past several decades are relevant for unit operations today. New categories should be added and record numbers reviewed and simplified to account for the rapidly evolving records needs and capabilities of the Army in an electronic records environment.

Recommendation 5.1: In coordination with concerned offices, commands, and units, ARMD must review and update the wartime and CONOPS records capture procedures to ensure they accurately reflect current operations. (36 CFR 1222.26(a)(1) and DA-PAM-25-403)

Recommendation 5.2: ARMD must review wartime and CONOPS records schedules to ensure they accurately reflect current operational needs. (36 CFR 1224.10(a)(c) and DA-PAM-25-403)

Recommendation 5.3: ARMD must develop a policy and procedure to routinely evaluate and review the collection and retention of wartime and CONOPS records. (36 CFR 1220.34(j) and DA-PAM-403)

Recommendation 5.4: The SAORM and ARMD should consider designating an official centralized collection point for wartime and CONOPS records and take measures to ensure that official records are retired to that point through policy and procedure. (DA-PAM-25-403)

¹² USARCENT/CFLCC (Coalition Forces Land Component Command) Appendix 4 (Records Management) to Annex H (Signal) to OPOD 6 (OSS). Authority was granted to ARCENT/CFLCC to collect records for Operation Iraqi Freedom, Operation Spartan Shield, Operation Freedom Sentinel, and Multinational Forces and Observers.

Electronic Records Management

Information efficiencies are of vital importance to the Army to meet the challenges of MDOs. Currently the Army is at a crossroads in terms of electronic records management and must determine the appropriate system to manage records now and in the long-term as the DA moves to a cloud environment. The risks associated with the failure to fully implement any system across the DA include:

- Failure to comply with Army Regulation 25-400-2.
- The inability of OCIO and ARMD to integrate records into enterprise architecture and Army planning for a unified network.
- Loss of standardization of record keeping requirements in units and commands
- Loss of efficiencies in knowledge and content management needed in an operational environment
- Improper records training
- The inadvertent destruction of records

Finding 6: Recordkeeping is being done in unsanctioned applications in contradiction to Army policies.

AR-25-400-2 designates ARIMS as the official records repository for all Army records. Use of the system has been mandatory across the DA since 2005. ARIMS is a robust electronic records management system (ERMS) with the capability to apply schedules to records, track RMO appointments, update office codes, control access, and conduct searches to name a few of its features. However, it is not-cloud based and the plans to transition it to cArmy could take three years or more. In addition, system adoption is uneven among offices, commands, and units. Many RAs reported staff resistance to use of ARIMS due to its complicated nature and issues with the movement of records using the bulk archive tool (BAT), which entailed significant wait times to upload files. The status of the electronic archive reflects these difficulties with only 26 terabytes of information stored in the system for the entire DA. Many RAs reported the continued use of shared drives or the transition to SharePoint sites in their commands. Rather than apply schedules to records on the drives or move them to ARIMS, in accordance with the Army mandate, many units are migrating them to A365 as they receive access to the system.

The transition to A365, along with the proposal that the system will have records management capability, has led offices, commands, and units to forgo the use of ARIMS in contravention to the 2005 directive. At several commands the RAs are moving forward with the development of records management capabilities in A365 and are configuring SharePoint repositories for offices and units. At the U.S. Army Medical Command (MEDCOM) the RA is implementing an Electronic Document Management System (EDMS) provided by the Army Medical Research and Development Command Enterprise Information Technology Project Management Office (eIT PMO). The majority of the other offices, commands, and units continue to use shared drives and SharePoint sites while utilizing ARIMS to prepare ORLs for the eventual move to cArmy.

DA-PAM-25-403 directs that RMOs must participate in the planning, development, deployment, and use of cloud computing solutions. It was noted that ARMD has not been consulted with any consistency by Headquarters, Department of the Army - (HQDA G6) regarding the records management capabilities in A365 or the movement of records into the system. Additionally, commands and units have not been informed of planning regarding the management of legacy electronic records and are waiting for guidance from ARMD. This has resulted in confusion regarding the use of ARIMS and frustration among SharePoint administrators in several commands as they migrate records from shared drives to SharePoint libraries without records management input or guidance. In one command HQ the move from shared drives to SharePoint libraries involves 600 terabytes of legacy records: records that could have been uploaded into ARIMS or destroyed according to schedule if they were managed properly. The move has resulted in untethered libraries due to the fact that offices no longer exist or no one has knowledge of who owns records on the shared drive.

No matter the system finally implemented, cArmy ARIMS or A365, the OCIO, ARMD, and HQDA G6 must get ahead of the rapidly changing electronic records landscape and provide definitive answers regarding the future of ERMS in the DA. Once a decision is made ARMD must issue guidance and training to offices, commands, and units to gain control of legacy records.

Recommendation 6.1: The SAORM, OCIO, and ARMD must provide immediate guidance on the future status of ARIMS and the viability of its utilization in cArmy. (36 CFR 1220.34(f) and AR-25-400-2)

Recommendation 6.2: OCIO, HQDA G6, and ARMD must create clear policy and procedures for the utilization of A365 as a records management system until the final status of ARIMS is determined. (36 CFR 1220.34(f) and AR-25-400-2)

Recommendation 6.3: ARMD must instruct all RMOs to apply NARA-approved dispositions to dispose of eligible electronic records. (36 CFR 1220 and 36 CFR 1236.14)

Recommendation 6.4: OCIO, HQDA G6, and ARMD must develop and disseminate instructions for migrating records contained in shared drives and SharePoint sites to A365 where appropriate. (36 CFR 1236.14 and DA-PAM-25-403)

Recommendation 6.5: OCIO, HQDA G6 and ARMD must issue instructions and standard operating procedures to review migrated data for discrepancies and report any losses to the ARO. (36 CFR 1236.14 and 36 CFR 1230 and DA-PAM-25-403)

Recommendation 6.6: The ARO must report any loss of records to NARA following procedures for reporting unauthorized disposition. (36 CFR 1230 and DA-PAM-25-403)

RECORDS WITHIN HISTORICAL COLLECTIONS, ARCHIVES, AND MUSEUMS.

Permanent records are federal records that have been determined by NARA to have sufficient value to warrant their preservation in the National Archives even while they remain in agency custody. The maintenance and transfer of these records is of vital interest to both the Army and the National Archives to protect the legal and financial rights of the government and persons directly affected by government activities. The improper maintenance or loss of these records entails the following risks:

- Loss of the ability to make command decisions based on lessons learned and historical operational decision making
- Costs for legal and FOIA searches and reviews
- Loss of the ability to protect the rights of personnel
- Loss of accountability to the public and the erosion of public trust
- Loss of access to records by the public
- Gaps in the historical record

Finding 7: Army centers, commands, and units maintain federal records in history collections, archives, and museums with limited oversight by ARMD.

The Army history program is highly decentralized with very limited records management oversight over history collections, archives, and museums. In all cases history programs in centers, commands, and units are required to adhere to ARMD policies and comply with the RRS-A. The CMH has evaluation authority over Army history programs but this does not include records management questions or reviews.

Interviews with ARMD and RAs in commands and units found little evidence of interactions with history program staff about records in their collections. In several cases RAs were unaware of the need to apply records management regulations to holdings in history collections. Many RAs did not know what records were being held by historians, archives, and museums or whether records schedules were being applied to them in accordance with the RRS-A. In other instances, history program staff were eliminated from a command or unit without notification to the RA or ARMD to develop succession plans for the records. The relationship between records managers and Army history program staff needs to be formalized to ensure that records are properly maintained and scheduled either for disposal or transfer to the National Archives.

Recommendation 7.1: ARMD must develop procedures to ensure the proper management of records in the history collections, archives, and museums according to Army and federal regulations. (36 CFR 1220.34(c) and DA-PAM-25-403)

Recommendation 7.2: ARMD must work with Army history programs to develop procedures to inventory and schedule records in history collections, archives, and museums. (36 CFR 1220.34(i) and DA-PAM-25-403)

Recommendation 7.3: ARMD must develop records management training for staff engaged in the management of historical records collections, archives, and museums. (36 CFR 1220.34(f) and NARA Bulletin 2017-01)

Recommendation 7.4: ARMD must develop procedures to evaluate history collections, archives, and museums compliance with records management policies. (36 CFR 1220.34(j) and AR-PAM-25-403)

Finding 8: Permanent records in history collections, archives, and museums are overdue for transfer and/or are being retained without notification to NARA.

36 CFR 1235.14 directs that agencies may only maintain records longer than specified in a disposition schedule with written approval from NARA. 36 CFR 1235.16 states that agency requests will be denied if the agency is retaining records to:

- (1) Provide access services to persons outside the agency that can be provided by NARA, or
- (2) Function as an agency archives, unless specifically authorized by statute or by NARA.

It was found that many Army offices, commands, and units have established history collections archives, and museums that maintain custody of original permanent records past their approved retention periods and have failed to transfer custody of these records to NARA in accordance with approved records schedules.

NARA interviews with Army offices, commands, and units noted the following history collections and archives:

- CMH maintains custody of numerous permanent records series from World War II forward that are overdue for transfer to the National Archives.
- Installations, Energy and Environment (IE&E) maintains custody of historic property records.
- U.S. Army Intelligence and Security Command (INSCOM) maintains an archive of 3,500 cubic feet of records.
- U.S. Army Reserve Command (USARC) has an archive of 2,500 cubic feet of records.
- U.S. Army Europe and Africa (USAREUR-AF) has a history collection that dates from the post-World War II era and contains approximately 300 cubic feet of records stored in inadequate space.
- U.S. Army Pacific (USARPAC) has 32 filing cabinets of historical records stored at Camp Humphreys, Korea.

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- Army Criminal Investigative Division (CID) has a records center of classified and unclassified investigative records that need to be reviewed to ensure that current records schedules are applied to the records and that significant case files are being identified for transfer to the custody of the National Archives.
 - U.S. Army South transferred historical records of an undetermined volume to the Chief of Staff and the U.S. Southern Command.

In addition to the records holdings discussed during the inspection, staff of the National Archives noted that photo collections are being retained by the U.S. Army Corps of Engineers headquarters and district offices despite continuing efforts to have them transferred to the National Archives. There are bound to be other series of permanent records that have not been identified by NARA or ARMD.

Finally, while NARA did not inspect the Army Heritage and Education Center (AHEC), it was noted by both CMH and ARMD that there is a significant archive at the Center with approximately 8,000 cubic feet of records. In addition to archives and historical collections it was stated that there are numerous museums throughout Army commands and units that maintain records.

In several instances it was reported that history collections, archives and museums are being maintained to suit the needs of commands and units to document their history. This does not negate the regulatory responsibilities of CMH, AHEC, or staff in offices, commands, and units to transfer permanent records to the custody of NARA in accordance with approved schedules.

Recommendation 8.1: ARMD must evaluate history collections to identify permanent records and follow procedures to notify NARA of the intent to retain the records. (36 CFR 1235.16)

Recommendation 8.2 ARMD must transfer overdue permanent records in history collections, archives, and museums to the National Archives if the request to retain the records is denied. (36 CFR 1226.22 and 36 CFR 1235.12)

Recommendation 8.3: ARMD must work with Army history programs to ensure appropriate public access to record holdings in history collections, archives, and museums. (44 USC 3101 Section 3(iv) and 36 CFR 1256.20)

Finding 9: There are potential unauthorized disposals or permanent record losses in Army offices, commands and units that have not been verified by ARMD and reported to the National Archives.

36 CFR 1230 requires federal agencies to notify the National Archives of any actual, impending, or threatened unlawful removal, defacing, alteration, corruption, deletion, erasure, or other destruction of records in the custody of the agency. 36 CFR 1230.14 provides instructions for reporting the loss or destruction of records to NARA. These instructions include requirements to investigate and report on all incidents related to unauthorized disposition, including efforts to recover or reconstruct lost records.

During NARA interviews of offices, commands, and units, several reports of the loss or destruction of records were made that require an investigation by ARMD. The following lists a few specific items mentioned but is not the full extent of potential losses:

- Unit records during Operation Iraqi Freedom, 2003-2010.
- The destruction of unit status reports from 1976-2001.
- The destruction of permanent records from HQDA during the period from 1985-2003.
- U.S. Army Human Resources Command (HRC) records reporting missing during an inventory review.
- The destruction of records of the Army Office of Public Affairs (PA) during September 11, 2001 terrorist attack on the Pentagon.

Despite the age of the losses in some of these allegations, ARMD is obligated to investigate and report to NARA on each of the alleged instances of unauthorized disposition.

Recommendation 9.1: ARMD must investigate all reports or allegations of the loss or destruction of records and report the results to NARA. (36 CFR 1230.14 and AR-PAM-25-403)

Recommendation 9.2: ARMD must develop a specific procedure or method to report and track records losses or destructions. (36 CFR 1230.14 and AR-PAM-25-403)

Recommendation 9.3: ARMD must develop training that details procedures for reporting the loss or destruction of records by all elements of the DA. (NARA Bulletin 2017-01)

Records Retention and Disposition

The maintenance of records past their NARA-approved retentions involves numerous risks to the DA including:

- Loss of intellectual control of records
- Costs for legal and FOIA searches and reviews
- Increased storage costs
- Difficulty accessing records for historical use or operational purposes
- Increased classification and security issues
- The potential for the unauthorized destruction, alienation, or loss of records

Finding 10: Records schedule implementation, particularly for legacy records, is inconsistent or not being done at all.

36 CFR 1226 stipulates that the application of schedules to federal records is mandatory. Federal records must be retained as specified in approved schedules to conduct government business, protect rights, avoid waste, and preserve permanent records for transfer to the National Archives of the United States.

Interviews with records management staff noted the presence of legacy analog records in almost every office, command, or unit. Listed below are a few examples:

- Army South maintains approximately 4,000 cubic feet of records seized during Operation Just Cause (Invasion of Panama) that have been in storage for decades and still await final disposition.
- U.S. Army Special Operations Command (USASOC) retains approximately 7,000 cubic feet of student training files that need to be dispositioned or reviewed for rescheduling due to changing business needs.
- U.S. Army Materiel Command (AMC) has a large volume of records from the Iraq and Afghanistan conflicts. Some are still in storage in Kuwait waiting to be returned to CONUS.
- The Army Office of Public Affairs (PA) maintains a considerable volume of analog records that have not been inventoried to determine their schedule status.
- Records staff of the U.S. Army Test and Evaluation Command (ATEC) noted an annex of records at Dugway Proving Ground that has not been inventoried or scheduled.
- In the U.S. Army Forces Command (FORSCOM), U.S. Army Reserve Command and U.S. Army Space and Missile Defense Command (SMDC) there was no firm knowledge of legacy analog holdings with records management staff acknowledging the need to investigate the situation in their components.

While there is a pressing need to address issues with legacy analog records, numerous offices, commands, and units also maintain significant backlogs of electronic records on shared drives that are unarranged and unmanaged. Other commands such as the ATEC have petabytes of test records that must be reviewed for disposition. In some cases, RMs and RCs do not have access to shared drives to review records. In other instances, system records have not been transferred to NARA according to approved records schedules. For example, ARMD has failed to transfer permanent files to the National Archives from the following systems:

- U.S. Army Human Resources Command Total Army Personnel Databases, System Data and Documentation, 2006-2022
- Army Court Martial Management Information System Data and Masterfile, 2011-2020
- U.S. Army Claims Service Tort and Special Claims Data and System Records, 2003-2017
- Arlington National Cemetery Interment Services System Data and System Records, 2006-2021
- Capabilities and Army Requirements Oversight Council (AROC) Management System (CAMS) Management System Masterfile, 2008-2020
- Equipment Common Operating Picture Masterfile, 2008-2020

Numerous other systems need to be reviewed to determine whether records should be transferred to the custody of the National Archives.

No matter the format, ARMD must be able to identify, track, and transfer permanent records to the National Archives or destroy them according to approved schedules. AR-25-400-2 requires that all offices, commands, and units create and maintain ORL to include hardcopy, electronic, and system records. ORLs are primarily used to identify long-term and permanent records for disposal or transfer to NARA. The continued use of these lists in cloud ARIMS or A365 is essential to ensure that records are properly identified and dispositioned by RMO staff.

Recommendation 10.1: ARMD must develop a plan to review and disposition records that are past their NARA-approved retention periods, including the transfer of permanent records to the National Archives according to approved records schedules. (36 CFR 1220.34 (i)).

Recommendation 10.2: ARMD must review ORLs to ensure they capture adequate information, such as inclusive dates, location, and volume of records, so as to provide a clear picture of DA records holdings. (36 CFR 1222.28)

Recommendation 10.3: ARMD must ensure that RMOs in offices, commands, and units have adequate access to records on shared drives, information systems, SharePoint, and ERMS or other storage areas to effectively identify and apply dispositions to records. (36 CFR 1220.34(d) and DA-PAM-25-403)

Finding 11: DA does not consistently capture or transfer records of defunct offices, commands, and units.

36 CFR 1222.26 sets the general recordkeeping requirements for agencies. Among these are instructions that each program must identify the record series and systems that must be created and maintained to document program policies, procedures, functions, activities, and transactions, and the office responsible for maintaining the record copies of those series and systems.

The U.S. Army is a dynamic organization and is constantly changing. Commands and units are frequently created, reassigned or disestablished. Offices are moved or abolished. During the inspection NARA encountered three components that were being radically transformed with mission critical functions being assumed by newly created commands or abolished altogether.

ARIMS tracks office symbols and allows for RMOs to create and manage them for recordkeeping purposes. However, without a procedure to follow when an office is abolished or transferred, records can be alienated, orphaned from their parent organization, or misidentified by the gaining organization. NARA encountered several instances of this problem during the inspection. In one case a KM specialist was creating SharePoint libraries for numerous unidentified office records to be dealt with at a later date because no one was sure of their ownership or provenance. In other instances, records were simply left behind because there was no chain of custody for them and it was left to RMOs to determine their disposition years and even decades after an office had ceased to exist. In many instances these records ended up in history collections, archives or museums because there was no knowledge of who owned the records once a command, unit or office was disestablished and no clear instructions about who to contact to ensure the proper disposition of the records. These records were at least accounted for, but in a worst case scenario, records can be lost or destroyed without the immediate application of the RRS-A.

There are also concerns that commands and offices are decommissioning systems prior to the review or scheduling by ARMD and NARA. APMS tracks registered systems and notes that many decommissioned systems are under review by records management staff. In some cases, this is tied to the consolidation, dissolution or closure of a component and needs to be tracked closely by ARMD or RMO staff to ensure the proper disposition of records or their continued retention if the system is not scheduled. System migrations also require closer ARMD oversight to ensure that migration plans are prepared and submitted for review in accordance with DA-PAM-25-403.

Recommendation 11.1: ARMD must create policies and procedures to account for records when an office, command, or unit is transferred or abolished. (36 CFR 1222.26)

Recommendation 11.2: ARMD must create procedures for the migration or decommissioning of EIS and the disposition of records in the systems. (36 CFR 1236.14 and AR-25-400-2)

Records Management Program Oversight

Proper and consistent oversight is one of the keys to the effective implementation of the Army records management program. In an organization as large as the DA it is imperative that guidance, controls, and evaluations are used to allow the SAORM and ARMD the ability to gauge the needs of the records management program across the entire Army. Without proper and robust oversight of records management the Army runs the risk of:

- Ineffective problem identification and correction
- Inability to set requirements and goals
- Inability to establish program accountability
- Inability to correct program deficiencies

Finding 12: Records management controls are not consistently incorporated into EIS across Army offices, commands, and units.

In 2017, DoDI 5015.02 was updated to emphasize the incorporation of records management into the acquisition, development, and enhancement of EIS and IT services. It noted that new and existing systems must incorporate records management and preservation considerations, and any records contained in the systems or IT services were to be managed in accordance with NARA-approved records disposition schedules.¹³ It is important to note that on May 22, 2023, the DoD issued its records strategy that will also impact how the DA incorporates records management controls into EIS.¹⁴

The DA and ARMD have made steady progress to ensure that the requirements of DoDI 5015.02 are met. APMS provides tracking for all new and legacy EIS and includes ARMD checks on system scheduling. In addition, the DA has issued form 7796, Automated Information Systems Questionnaire, to gather basic information about system configuration to upload into APMS. The form assists ARMD in ensuring that record management controls are embedded within systems, integrated into system migration processes, and built into the final disposition of the records in systems that are decommissioned.

While ARMD has gained control of many EIS through the utilization of APMS, there are still areas in DA that do not follow the requirements of DoDI 5015.02. It was noted that several commands and units have their own IT components that continue to develop or utilize systems that are not included in APMS and which do not have records management controls as required by 36 CFR 1236.6(b). Additionally, it was reported that RAs and RMs in commands and units need more training in APMS. Finally, RAs in several commands stated that records management was not incorporated into the development and approval of EIS either through portfolio management working groups or technology review boards.

¹³ DoDI 5015.02, DoD Records Management Program, August 17, 2017.
<https://www.esd.whs.mil/portals/54/documents/dd/issuances/dodi/501502p.pdf>.

¹⁴ DOPSR 23-S-2095, DoD Records Strategy, May 22, 2023.
<https://dodcio.defense.gov/Portals/0/Documents/Library/DoDRecordsStrategy.pdf>

In addition to traditional issues with the incorporation of records management into EIS development, RAs at commands and units reported the additional burden of application development associated with A365. Open access to application builders on A365 is raising the prospect of data use and records creation without oversight by ARMD or RMOs. Though not a widespread problem at this time, there were concerns that this was an issue that needed to be addressed by OCIO and ARMD sooner rather than later.

Recommendation 12.1: OCIO and ARMD must develop procedures that implement DA PAM 25-403 3 to ensure that RMOs in offices, commands, and units are included in the design, development, enhancement, and implementation of EIS. (36 CFR 1236.6(b))

Recommendation 12.2: OCIO should ensure that ARMD representation is included in appropriate IT investment governance forums to ensure consideration of records management in EIS design, development, enhancement, and implementation. (36 CFR 1220.34, AR-25-400-2 and DA-PAM-25-1-1).

Finding 13: Army commands and units do not routinely conduct records outbriefs that ensure that departing senior officials do not remove federal records from agency custody.

36 CFR 1222.24(a)(6) requires that agencies establish procedures to ensure that departing officials and employees do not remove federal records from agency custody. DA-PAM-25-403 requires that ARMD, RAs, RMs, and RCs give senior officials exit briefings before they depart their positions to ensure that they do not delete or remove government information.

ARMD has recently introduced a set of training slides to address records responsibilities for incoming and departing senior leaders. Several commands such as Army Installation Command (IMCOM) have good out-brief processes but interviews with many offices, commands, and units revealed gaps in the senior leader out-brief activities of RAs, RMs, and RCs. Many RAs and RCs were spread too thin to conduct out-briefs with consistency while others encountered resistance or simply did not do them. Given the frequency of movement among senior leaders in the Army, with many rotating in and out of positions after only two to three years, it is important that RMO staff conduct exit briefings in accordance with DA-PAM-25-403.

Recommendation 13.1: ARMD and RAs, RMs and RCs in offices, commands, and units must conduct records management exit briefings with designated senior leaders. (36 CFR 1222.24(a)(6) and DA-PAM-25-403)

Recommendation 13.2: ARMD must review the structure and content of current exit briefings to ensure they collect sufficient information to protect against the inadvertent removal of federal records by civilian employees, contractors, and service members. (36 CFR 1222.24(a)(6) and DA-PAM-25-403)

Finding 14: ARMD, commands, and units are not conducting regular evaluations.

36 CFR 1220.34(j) requires agencies to conduct formal evaluations to measure the effectiveness of records management programs and practices. To meet this requirement AR-25-400-2 directs ARMD to conduct formal evaluations to measure the effectiveness of records management programs and practice throughout the Army. DA-PAM-25-403 requires RAs and RMs to evaluate their organizations' records management programs every two years.

Interviews with ARMD, commands, and units indicated mixed success with evaluations and a variety of practices and methods. During the recent COVID pandemic ARMD suspended internal evaluation control activities. In addition, RAs and RMs in many commands and units suspended their inspection and staff assistance activities or assumed responsibility for programs that had not conducted them in quite some time. During that period ARMD issued DA Form 7913, Records Management Program Assessment Checklist, which covers basic performance measures outlined in DA-PAM-25-403. In some instances, commands and units have developed their own checklists and issue findings and recommendations to senior leaders along with root cause analyses and plans of action. Some commands work with their IG or even cybersecurity to conduct evaluations.

While there was some good work going among the RAs interviewed, the majority of commands and units were not doing evaluations or were just restarting them after a hiatus during the pandemic. In an organization as large and geographically dispersed as the DA, the need for a continuous and robust records management evaluation program is paramount. It is impossible to gauge existing or emerging risks without a program that provides an overview of the records situation to senior leaders and ARMD. Records management evaluations must be conducted regularly with recommendations for improvement and follow up actions included as needed.

Recommendation 14.1: ARMD must develop a reporting procedure to ensure that evaluations are being conducted by RAs and RMs in offices, commands, and units. (36 CFR 1220.34(j) and DA-PAM-25-403)

Recommendation 14.2: ARMD must develop a procedure to compile and report evaluation results to the SAORM and other senior Army leaders for review and action as needed. (36 CFR 1220.34(j))

NOTEWORTHY PRACTICES

Training

Among the many initiatives being undertaken by ARMD, the revised training program has received the most praise. RAs and RMOs routinely complimented the ARO and the Chief of the Training and Assessment branch on the accessibility of annual training modules in the Army Learning Management System (ALMS). New modules have been created for basic records training, training for senior officials, records management officials and ARIMS. In accordance with DoDI 5015.02, training is delivered to all soldiers, civilians, and contractors on an annual basis. RMO staff also praised the availability of ARMD personnel to answer follow up questions and provide hands-on assistance to their own training initiatives.

It was also found that numerous offices, commands, and units had their own training programs, many of which were noteworthy. To deal with the high turnover among RCs, staff of the HRC created a “flipbook” to train new RCs on a step by step basis. They also provide access to a customer care team to answer questions. ATEC also tailors its training for RCs. Many commands such as the U.S. Army Training and Doctrine Command (TRADOC), U.S. Army Installation Management Command (IMCOM), AMC, and USAREUR-AF have new training and provide hands-on assistance or lunch and learn sessions to staff. Training at INSCOM has been mandatory for some time and failure to complete the course results in loss of access to email accounts.

In general, it was found that a high level of dedication to staff training existed among RMOs in all offices, units, and commands interviewed during the course of the inspection. It was quite clear that given the complexity of Army recordkeeping this training was necessary and welcomed.

The Army Portfolio Management System-Army Information Technology Registry

Though not originally designed to track the inclusion of DoDI 5015.02 or AR-25-400-2 standards in systems development, the APMS was adapted to add workflows for records management requirements. Now all registered IT investments are reviewed to ensure they include the following:

- Record Data
- ARMD Certification
- Schedule Status
- Schedule Date
- Disposition Authority
- ARIMS Record Number
- Records Management Contact Points
- Records Management Comments
- System Deletions
- Deletion Comments

Inclusion of ARMD in the APMS validation process gives the DA the ability to ensure the incorporation of records management requirements in the creation and implementation of new EIS in accordance with regulations. It also allows ARMD access to system information needed to schedule the large backlog of EIS described in the system. Continued utilization of DA Form 7796 will ensure that ARMD and records management requirements are incorporated into the development of DA enterprise architecture.

Capstone Email Tracking

In 2022, there were 601 Capstone officials in the DA. Tracking the movement of officials and capturing their emails as they move in and out of Capstone positions is a monumental task. To resolve this issue the Administrative Assistant to the Secretary of the Army developed a database to capture the names and positions of Capstone officials on a continuing basis. In coordination with ARMD, the General Officers Management Office, the Civilian Senior Leader Management Office, Chief of Army Reserve, Commander of the Army National Guard, the Capstone database is updated each month and the Army enterprise service desk informs senior leaders that they are Capstone officials. In turn, the database is used as a reference source for the transfer of the emails to NARA. This system has been highly effective in maintaining lists of Capstone officials and capturing their emails for eventual transfer to NARA.

RM Relationships with other Information Governance Programs

The incorporation of records management into information governance (IG) is part of the framework covered by OMB Federal Data Strategy - A Framework for Consistency (M-19-18) as it provides a vision for managing and using federal data, along with recordkeeping requirements included in OMB Circular A-130, Managing Information as a Strategic Resource. Within the Army all RAs and RMs were working as best they could in their circumstances, but several programs showed a high degree of program integration that should be noted.

Typically, records management programs that had mature relationships with knowledge management staff and IT staff were strong. IT staff is always vital to the management of electronic systems and records but active collaboration with knowledge managers who think about people, processes, and tools for managing information is also important. Working with these programs helped RMOs fill in the gaps where there were staffing shortfalls in records management and allowed the programs to cooperate to assist in managing records and EIS on a daily basis. This was particularly true at INSCOM where there was a high degree of collaboration between the CIO, KM, and the RA to oversee, manage, and evaluate the records program. It was the same case at USASOC where the Chief Knowledge Manager is also the RA and integrates records and knowledge management activities very well to disseminate training and information about the program. In other commands and offices such as ARCENT and the Criminal Investigation Division, there was close communication and collaboration between IT and records management to ensure that systems complied with the needs of the records program.

In each of these instances, relationships were well established and supported over time. Other offices, commands, and units knew the value IT and KM offered to their programs and were working to integrate their programs whenever they could. As ARMD moves forward on other elements, such as data management, ARMD should form an integral part of the relationships that help foster a strong information management cohort that moves records management into the world of multi-domain operations.

CONCLUSION

The management of records in the DA faces severe challenges. The expectation, expressed by several senior leaders, that artificial intelligence will solve long standing records issues at the DA is simply not a realistic solution to these challenges at this time. Immediate and concerted action must be taken to resolve records keeping issues, manage historical records, and ensure that the daily and operational activities of the Army are documented for today's service personnel as well as those of the past and the future. The Army records management program must be seen as a key component of DA planning to fully engage with the information age and the world of MDOs. To accomplish this, the records management program must be restructured and resourced given resources it needs to successfully fulfill its mission. Without addressing these resources, the program will increasingly fall behind the information management needs of the Army.

APPENDIX A INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well the DA 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 through a combination of document reviews, virtual and in person interviews

NARA carried out this inspection through a combination of document reviews, virtual and in person interviews and

- reviewed records management policies, directives, and other documentation provided by the Army Records Management Directorate (ARMD),
- interviewed program staff,
- reviewed responses to current and past annual Records Management Self-Assessment, Senior Agency Official for Records Management, and Federal Email Management reports; and
- the Army Records Officer participated in all virtual and in-person interviews

OFFICES/COMMANDS VISITED/INTERVIEWED

- Army Records Management Directorate (ARMD)
- Army Records and Information Management Systems (ARIMS) update and development team
- Army Chief Information Officer (CIO)
- Army Chief Data Officer (CDO)
- Army Criminal Investigation Division (CID)
 - Army Crime Records Center
- Army Office of Public Affairs (PA)
- Office of the Assistant Secretary of the Army for Installations, Energy and Environment (IE&E)
- The Judge Advocate General of the US Army (TJAG)
- U.S. Army Central Command (ARCENT)
- U.S. Army Europe-Africa Command (USAREUR-AF)
- U.S. Army Forces Command (FORSCOM)
- U.S. Army Futures Command (AFC)
- U.S. Army Human Resources Command (HRC)
- U.S. Army Intelligence and Security Command (INSCOM)
- U.S. Army Materiel Command (AMC)
 - U.S. Army Environmental Command (AEC)
 - U.S. Army Installation Command (IMCOM)

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- U.S. Army Medical Command (MEDCOM)
 - U.S. Army North (ARNORTH)
 - U.S. Army Pacific (USARPAC)
 - U.S. Army Reserve Command (USARC)
 - U.S. Army South (ARSOUTH)
 - U.S. Army Space and Missile Defense Command (USASMDC)
 - U.S. Army Special Operations Command (USASOC)
 - U.S. Army Test and Evaluation Command (ATEC)
 - U.S. Army Training and Doctrine Command (TRADOC)
 - Center for Military History (CMH)

APPENDIX B
RELEVANT INSPECTION DOCUMENTATION

Department of Defense (DoD) or Other

- DoDI 5015.02, DoD Records Management Program, August 17, 2017
- DoDI 5015.02 STD, Electronic Records Management Software Applications Design Criteria Standard, April 25, 2007
- DoDI 8170.01, Online Information Management and Electronic Messaging, August 24, 2021
- DoDI 8320.02, Sharing Data, Information, and Information Technology Services in the Department of Defense, June 24, 2020
- DOPSR 23-S-2095, DoD Records Strategy, May 22, 2023
- DTM 22-001, DoD Standards for Records Management Capabilities in Programs Including Information Technology, March 3, 2022
- Secretary of Defense Memo, Guidance on Transition and Archiving of Official Social Media Accounts, January 6, 2017

Department of the Army

- Secretary of the Army Memorandum, Preservation of Army Records, February 22, 2005
- Secretary of the Army Memorandum, Mandatory Implementation of Army Data Services Requirements, April 10, 2020
- Secretary of the Army Memorandum, Collection of U.S. Army Records From Operation Enduring Freedom, Operation Iraqi Freedom and Operation New Dawn, July 1, 2013
- Reference Memorandum, Implementation of Army Records Information Management System, Preservation of Army Records, June 27, 2005
- The Army Unified Network Plan Framework, 2021

Army Records Management Directorate

- Army Regulation 25-400-2, Army Records Management Program, October 18, 2022
- Army Regulation 25-400-2, The Army Records Information Management System (ARIMS), September 30, 2004
- Army Pamphlet 25-403, Army Guide to Recordkeeping, August 11, 2008
- Army Pamphlet 25-403, Army Guide to Recordkeeping, November 10, 2022
- Joint Staff Records Management, Collection and Preservation of Contingency Operations Records, Big Bucket Project Status, July 23, 2010
- Records Management Annual Training
- Records Management for Senior Officials
- Records Management Officials Training Course

Center for Military History

- Handbook No. 09-22, Commander's Guide to Operational Records and Data Collection, Tactics, Techniques, and Procedures, March 2009
- Army Technique Publications No. 1-20, C1, Military History Operations, August 20, 2015
- Army Regulation 870-5, Military History: Responsibilities, Policies, and Procedures, September 16, 2021
- Army Regulation 870-20, Army Museum Enterprise and Army Artifact Collection, June 27, 2022
- CMH Employee Handbook

Office of the Chief Information Officer

- Army Regulation 25-1, Army Information Technology, July 15, 2019
- Army Pamphlet 25-1-1, Army Information Technology Implementation Instructions, July 19, 2019
- Army Pamphlet 25-91, Visual Information Procedures, January 17, 2019
- Army Data Board Charter, October 3, 2009
- Army Data Plan, 2022
- Army Data Governance Roles and Responsibilities, July 1, 2022

Office of Public Affairs

- Army Regulation 360-1, The Army Public Affairs Program
- ALARACT 073/2022, Army Social Media Policy, October 2022

US Army Central Command

- USARCENT Regulation 25-1, Records Management Program, August 10, 2020
- USARCENT/CFLCC Appendix 4 (Records Management) to Annex H (Signal) to OPOD 6 (OSS)
- USARCENT, Records Management Training, One Day Course, September 9, 2022

U.S. Army Europe and Africa

- Southern European Task Force, Africa Records Management Training, November 18, 2022

U.S. Army Human Resources Command

- HRC Records Management Program Standard Operating Procedures,
- OPOD 21-23, Transition to Electronic Records, June 8, 2021
- HRC Records Coordinator Flipbook

U.S. Army Installation Management Command

- OPORD 21-014: Modernization of IMCOM Records Management Program, December 2020.
- Records Management Exit Checklist for Soldiers and Civilian Employees,

U.S. Army Materiel Command

- AMC Pamphlet 1-2, Staff Procedures, January 4, 2019
- Operation Order 21-166, AMC Modernization of the Records Management Program and Transition to Electronic Records Management, May 2021
- HQAMC, Army Records Management Training, ARIMS System III, December 2022

U.S. Army South

- U.S. Army South ARIMS Training, August 2021

U.S. Army Test and Evaluation Command

- ATEC Records Management for Records Managers and Coordinators, Modules 1-3, January 2023

U.S. Army Training and Document Command

- TRADOC Supplement 1 to Army Regulation 25-1, March 17, 2021
- Information Paper, CONOPS Records Management, July 15, 2021

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)
- OMB/NARA *Update to the Transition to Electronic Records* (M-23-07)
- 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

The DA will submit to NARA a Plan of Corrective Action, 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 the DA on the plan within 60 calendar days of receipt, and assist the DA in implementing recommendations.

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

APPENDIX D
SELECTED ACRONYMS AND ABBREVIATIONS

A365	Army Microsoft Office 365
AASA	Administrative Assistant to the Secretary of the Army
ACOM	Army Command
AHEC	Army Heritage and Education Center
AHRO	Army Historical Resources Online
ALMS	Army Learning Management System
APMS	Army Portfolio Management System
AR	Army Regulation
ARIMS	Army Records Information Management System
ARMD	Army Records Management Directorate
ARO	Army Records Officer
ASCC	Army Service Component Command
BAT	Bulk Archive Tool
cArmy	Army Cloud Environment
CDO	Chief Data Officer
CIO	Chief Information Officer
CFLCC	Coalition Forces Land Component Command
CFR	Code of Federal Regulations
COCOM	Joint Staff Combatant Command
CONOPS	Contingency Operations
CONUS	Continental United States
DA	Department of the Army
DoD	Department of Defense
DoDI	Department of Defense Instruction
DRU	Direct Reporting Unit
EDMS	Electronic Document Management System
EIS	Electronic Information System
eIT PMO	Enterprise Information Technology Project Management Office
ERMS	Electronic Records Management System
HQ	Headquarters
HQDA	Headquarters, Department of the Army
IRM	Information Resources Management
IT	Information Technology
KM	Knowledge Management
MDO	Multi-domain operations
MHD	Military History Detachments
MSC	Major subordinate command
NARA	National Archives and Records Administration
OCIO	Office of the Chief Information Officer
OMB	Office of Management and Budget
ORL	Office Records lists
PAM	Pamphlet
RA	Records Administrator

RM	Records Management / Records Manager
RC	Records Coordinator
RCS	Records Control Schedule
RM	Records Manager
RMO	Records Management Official
RRS-A	Records Retention Schedule-Army
SAORM	Senior Agency Official for Records Management
TRADOC	Training and Doctrine Command
TRM	Theater Records Manager
U.S.	United States
U.S.C.	United States Code



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