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Records Management Program

Records Management Inspection Report

National Archives and Records Administration
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**DEPARTMENT OF DEFENSE - OFFICE OF THE SECRETARY OF DEFENSE
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 Navy (DON) 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 DON and its components comply 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 DON including the Secretary of the Navy (SECNAV), United States Navy (USN), and the United States Marine Corps (USMC) with a focus on policies, electronic records management, strategic planning, training, oversight, and history collections. Additionally, it sought to identify practices of interest to other DoD components and to the wider federal records management community. (See Appendix A for a list of participating organizations within the DON.)

Overall, the DON has a compliant records management program that has similar challenges that other DoD programs have including organization-wide implementation, communications, and coordination. As one of the largest programs in DoD, it also has some unique challenges, some innovative solutions, and interesting approaches. This report makes 14 findings and 35 recommendations with some specifically for the DON and others for the USN and the USMC. There are also sections listing other challenges or concerns and noteworthy practices.

OVERVIEW OF THE DON RECORDS MANAGEMENT PROGRAM

The DON records management program, under the Assistant for Administration (DON/AA) Directives and Records Management Division (DRMD), is governed by Secretary of the Navy policies and procedures implemented by DRMD under the direction of the DON/AA. This is also referred to as the Records Management Program Office. The Assistant for Administration serves as the Senior Agency Official for Records Management (SAORM).

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

The DON Agency Records Officer (ARO) also serves as the records management contact point for SECNAV organizations. The point of contact or Records Officer (RO) for USN is the Director of Administrative Program Management under the Director of Navy Staff (DNS). The USMC RO under the Headquarters Marine Corps (HQMC), Administration and Resource Management Division (AR), Publishing and Logistics Management Branch (ARD), Records, Reports, Directives and Forms Management Section (ARDB) has its own records management orders and policies that follow the DON policies with additions to reflect the needs of the USMC. The USMC has a designated RO that as of May 2022 is a full-time position instead of a collateral duty. These three positions are essential for carrying out records management functions and ensuring compliance with federal records management statutes and regulations, DoD and DON regulations, orders, and instructions. Compliance is also monitored by the Office of Inspector General through audits and evaluations assisted by the DON ARO, USMC RO and USN RO.

The day-to-day implementation and oversight of records management functions is conducted by Records Managers (RM) assigned at the Echelon II (EII) levels and then pushed down through the lower Echelons². The SECNAV and USN Echelon RMs follow DON orders, instructions and policies, and supplement with their own when necessary. The USMC has a different structure than SECNAV and USN and assigns Command Designated Records Managers (CDRM) with records management responsibilities, and develops, implements, and oversees its own electronic information systems (EIS) and Electronic Records Management Systems (ERMS). The DON ARO and USMC RO are full time positions. Other staff assigned records management responsibilities are collateral duties, often one of many.

PROGRAM STRENGTHS:

- Records management is included in the overall information management, data management and information governance structure.
- Retention schedules are reviewed and updated via periodic and ad hoc tasking as well as the ongoing DRMD comprehensive RCS review effort.
- DON ARO, USN RO and USMC RO are knowledgeable, seasoned records management professionals.
- Current active records are well maintained, mostly in electronic formats, and are accessible.
- Naval History and Heritage Command (NHHC) and USMC History Division staff are professional archivists, historians, and records managers committed to the preservation of collections, providing access to the materials, documenting, and promoting Naval and USMC history.
- The DON requires each organization regardless of Echelon level to assign records management responsibilities.
- Many of those assigned records management responsibilities take the task seriously and do the best they can with the time and resources they have available.
- The DON is committed to improving electronic records management and the use of technology to the fullest extent feasible.

² Echelon is the name given to the administrative organization of the USN below the Chief of Naval Operations and consists of the operating and support forces and acquisition commands. OPNAVINST 5400.45

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- The USMC has a three-phased approach for electronic records management backed by a Plan of Action and Milestones (POA&M) that is proving to be effective as the work moves forward.

PROGRAM RISKS

- Ineffective communication, coordination, and collaboration across the DON records management programs is an area of concern.
- The network of record managers does not consistently interact with each other or with the DON ARO, USMC RO or USN RO enough to form an interactive community of practice.
- Consistent implementation of records management is impacted by high turnover of records managers and coordinators.
- Those assigned records management responsibilities as a collateral duty do not have the time to carry out those responsibilities.
- There are challenges with records schedule implementation.
- There are gaps in the transfer of records to historical collections and the transfer of permanent records to the National Archives.
- Some records are being stored in facilities in poor condition.
- There were challenges with the adoption of previous Electronic Records Management Systems (ERMS) and Records Management Applications (RMA) that still exist for the current transition to Microsoft Office 365.

FINDINGS AND RECOMMENDATIONS

Support for records management includes advocacy by senior management that promotes effective records management practices through various initiatives and adequate resources for the records management program including budget allocations for:

- Sufficient records management staff
- Records and information management staff training
- Development and maintenance of recordkeeping systems
- Design and development of EIS
- Migration of data from obsolete formats and electronic systems into new formats and systems
- Digitization of permanent non-electronic records
- Storage and maintenance of records regardless of format

The following findings and recommendations are intended to assist the DON to identify ways to address the most immediate program risks.

RM PROGRAM ADMINISTRATION, COMMUNICATION, COOPERATION AND SUPPORT

Many of the following findings and recommendations reflect the need for improving the oversight and implementation of records management policies and instructions through consistent direction and guidance including communication, coordination, individual assistance, and cooperation. The key elements for implementing a successful records management program for an organization as large and complex as the DON are relationships, communication, cooperation, and collaboration among organizations.

Finding 1: There is a need for strategic planning, goals or performance measures to strengthen the DON records management program.

36 CFR 1222.26 (a)(5) requires that agencies develop 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. In addition, *OMB Circular A-130: Managing Information as a Strategic Resource* includes records management.

The DON/AA DRMD records management program is included in modernization plans (including the transition to Microsoft Office 365 that impact records management and to a limited degree in the overall information and data management strategic plan. However, the records management program does not have a comprehensive strategic or performance plan. Such a plan could include enhancing the tools available and use of the network of Records Managers (RMs) to increase the effectiveness of the records management program.

The USMC, while part of the DON, has significant differences in its organizational and command structure that impacts how records are created and maintained. This includes the roll out of Microsoft Office 365 and the use of SharePoint. While the USMC RO has a variety of records management initiatives, there is not an official strategic plan or performance plan that includes how USMC will align with the DON records management policy and where it does not or cannot.

Recommendation 1.1: The DON must establish a strategic and/or performance plan for the records management program that outlines goals and objectives that will assist in maintaining the program. (36 CFR 1222.26(a)(5) and OMB Circular A-130)

Recommendation 1.2: The USMC must establish a strategic and/or performance plan for the records management program that outlines goals and objectives that will assist in maintaining the program and align with the requirements of the DON records management program. (SECNAVINST 5210.8F), (36 CFR 1222.26(a)(5) and OMB Circular A-130)

Finding 2: The efficiency and effectiveness of the DON Records Management Program is impacted by unclear communication and uneven application of the roles and responsibilities delineated in SECNAVINST 5210.8F.

36 CFR 1220.34 requires agencies to issue directives and assign records management responsibilities. The DON/AA records management program meets this regulation with its policies including requiring RMs in each program and administrative area and providing training. However, the effectiveness of the program is dependent upon communication and collaboration among the ARO, ROs and RMs, which needs improvement.

The DON/AA DRMD Records Management Program Office consists of the Director, DRMD and the ARO, supported by two full-time employees and nine contractors. While some of the staff support both records management and the directives programs, one full-time employee and four of the contractors work entirely on records management. An organization the size and complexity of the DON would benefit from additional full-time staff members assigned records management to coordinate the work of such a large network of individuals.

The DON/AA DRMD expands the reach of the DON ARO through:

- Delegating duties between the DON ARO, USMC RO and the USN RO.
- Creating an extensive network of Records Managers in offices and commands at all levels for SECNAV, USN, and USMC.
- Maintaining an information portal and ticketing system providing important information, including access to manuals, frequently asked questions (FAQ), training modules, and announcements of events. The ticketing system triages questions, comments and requests for assistance.
- Holding quarterly meetings with all members of the DON records management community to discuss changes to policies or systems, including ARO briefings and question and answer sessions.

USN RO and USMC RO

These two positions provide opportunities within the DON to strengthen the network of records managers and implementation of the program. The individuals assigned to these roles handle these responsibilities within their spheres of influence well. The USN RO is firmly established to assist with record management projects, questions, and records disposition. The USMC RO position has recently been upgraded to a full-time billet and has contractor support. The USMC RO is building the program and working to increase visibility and viability. While this does not replace the oversight of the USMC by the DON/AA DRMD, it does allow the DON ARO to focus on the needs of the SECNAV and USN.

The DON ARO needs the assistance that delegating certain roles and responsibilities to the USMC RO and USN RO brings. However, in practice the relationships are fragmented, and require greater communication and collaboration. There are unnecessary struggles for authority or control weakening the potential for a strong records management program.

Objectives, strategy, mission, and structure differences particularly between the DON and USMC require a degree of communication, cooperation, and trust that does not currently exist. These differences could be mitigated by developing a comprehensive strategy (see Finding 1) or performance plan with goals and objectives that include improving communication and cooperation with mutually agreed upon roles and responsibilities. .

There is a need for greater understanding of the delegation of authorities and/or responsibilities delineating when independent action versus coordination needs to take place. This would strengthen these roles and the DON records management program in many areas such as:

- Oversight
- Chain of command or structural differences where they exist
- Working on basic records management functions and interactions with NARA, including but not limited to:
 - Records scheduling
 - Records storage and Federal Records Centers processes
 - Permanent records transfers
 - Maintaining Capstone lists
 - Annual records management reporting
 - Executive and senior leadership support or sponsorship.

It is essential that these roles and responsibilities are clearly defined, understood, and agreed upon to enhance the overall operation of the program.

Records Manager Network

Commands and offices within the DON are required by SECNAVINST 5210.8F to designate a Records Manager.³ The result is an impressive network that enables active records to be managed. However, for the majority of those within this network, records management is a collateral duty that is not given the time it needs. With the RMs and USMC CDRMs there are enough people assigned to implement records management; however, in addition to a lack of time, staff interviewed expressed feelings of being disconnected from the DON/AA DRMD.

A recurring theme reflected in inspection interviews with RMs was a desire for more information directly from DON/AA DRMD that would assist them not only in understanding their own responsibilities but in explaining or interpreting policies, guidance, and Records Control Schedule (RCS) and Standard Subject Identification Codes (SSIC) implementation to personnel in their organization, including leadership. The other concern voiced often was a lack of clear and timely information regarding major changes or initiatives. Examples given were changes to the RCS and/or the SSIC and how to prepare for the upcoming implementation of Microsoft Office 365. It is essential the DON ARO fully utilize and engage with this network, but with emphasis on engaging with the RO and RO so that they can further assist their subordinate organizations This could assist the DON ARO in effectively managing and overseeing the RM

³ SECNAV 5210.8F requires each USN Echelon II/USMC Staff Agency Head and Marine Corps Commanding general to designate a Records Manager in writing with authority to execute the Records Management Program. Echelon III commands also have appointed Records Managers.

program in accordance with 44 U.S.C. 3102 and fulfilling its responsibilities under federal, DoD, and DON regulations.

DON/AA DRMD Portal and Ticket System.

This use of SharePoint to provide a central place for information and requests for assistance is an excellent way to expand the reach of the DON ARO beyond the SECNAV RM's. Some of the RMs have used this concept to create their own SharePoint sites to expand their reach through their organizations and link to the DON/AA DRMD portal information. It is an effective way to manage requests for assistance or information. (See the Noteworthy Practices section of this report for others.) However, USN RMs did not appear to be consistently using the system and may not be fully aware of its potential.

Recommendation 2.1: The SAORM, with DON/AA DRMD, must review how SECNAVINST 5210.8F delegates records management roles and responsibilities to identify any necessary updates in coordination with CNO and CMC. (NARA Bulletin 2017-02, OMB Circular A-130, and 36 CFR 1220.34)

Recommendation 2.2: The SAORM, DRMD, DON ARO, USN RO and USMC RO must establish a plan that enables more effective communication and effective use of the RM network. (NARA Bulletin 2017-02 and OMB Circular A-130, 36 CFR 1220.34)

Finding 3: Consistent implementation of records management is at risk due to how turnover within the Records Managers network is handled.

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. SECNAV and OPNAV Directives, and USMC Orders and Instructions implement this regulation.

In some SECNAV and USN organizations and throughout the USMC, the responsibilities are assigned to active-duty personnel with a few organizations appointing civilians to handle records. The turnover rate is very high, especially as active-duty personnel rotate assignments. There is little or no time to focus on the collateral duty. There is a requirement for a newly appointed RM to complete a self-assessment that is sent to the DON ARO within 90 days of assuming the responsibility. There is also a requirement to address any discrepancies. However, some RMs indicated they did not have copies of previous RMs assessments, or if they did find copies, previous findings had not been addressed or the solutions were temporary fixes.

In the interviews with Marine Corps Air Fields (MCAF) and Marine Corps Air Stations (MCAS), it appears there is good control using the Command Records Operational Support Site (CROSS) system, but only if the person assigned as the CDRM takes an active interest. The Marine Base Camps (MBC) in some instances do not have Command Records Managers at all. This makes it difficult for the USMC RO to have a stable and effective network of Command Records Managers to help with nationwide oversight. The CROSS system serves incoming

Command Records Managers well only if the previous person maintained it properly. If not, the incoming CDRM starts from scratch.

Recommendation 3.1: The DON ARO, in concert with the USN RO and USMC RO, should create a plan to review how well Commands and offices are filling positions and handling the state of the records when staff assigned the RM roles and responsibilities changes. (SECNAVINST 5210.8F)

Recommendation 3.2: USMC should review the efficacy of assigning only active-duty personnel with CDRM responsibilities and consider civilian positions or separate civilian billets that would be more effective either in supporting the CDRM or as the CDRM. (36 CFR 1220.34(d))

Recommendation 3.3: The USMC should develop procedures to routinely evaluate how well CROSS is being used in order to improve the turnover process to an incoming CDRM when staff assigned the RM roles and responsibilities changes.

Records Control Schedule (RCS)

Finding 4: There are Records Control Schedule (RCS) and disposition implementation challenges.

36 CFR 1224 and 1225 cover records disposition and the creation of records retention schedules. The DON uses the term Records Control Schedule (RCS). The RCS contains a large number of SSIC codes to identify records that were consolidated into Big Bucket format, divided into 13 Chapters based on standard functions across the DON such as personnel, information technology, operations and readiness, logistics, general administration, financial management, facilities, and other topics. Changes to the RCS are streamlined by using a spreadsheet format.

While there are full crosswalks on the internal DON portal that include superseded legacy dispositions for reference, as well as the legacy file numbers, titles, and descriptions, USN staff interviewed indicated they had difficulty implementing the RCS. USMC staff also specifically indicated that they have difficulty identifying USMC-specific records embedded in the DON records control schedule (RCS). The USMC RO is currently assisting CDRMs by creating files plans and a crosswalk of USMC records aligned to the DON RCS and SSIC codes.

Normally any given office or organization has a limited number of record series that relate to information that is created and maintained for routine business purposes. Basic records management practice is to identify only those records in a file plan or file structures relevant to that unit, program, or office. The RM's interviewed indicated they had difficulty identifying only those SSIC codes that apply to records created by their office or entity. Others, instead of setting up their file structures based on what records they actually use, established a structure that lists all possible SSIC functions. This means there are empty folders for unused SSIC codes. This creates a risk of records accidentally being dropped into the wrong folder and the appearance that something is missing because a folder is empty. This is a poor practice and should be discouraged. We recommend strengthening records management training around RCS implementation.

Recommendation 4.1: DON ARO must provide additional training focusing on using the Records Control Schedule appropriately. (36 CFR 1224.10)

Recommendation 4.2: The Echelon RMs and USMC Command Records Managers should discontinue setting up empty folders for SSICs that are not relevant to their organizations' records.

Recommendation 4.3: The USMC should continue analysis of the record schedules listed in CROSS to determine if CDRMs are identifying appropriate schedules from the DON RCS for records pertinent to their organizations and to identify any unscheduled records or existing schedules that merit a schedule change request to the DON ARO with appropriate explanations.

PERMANENT RECORDS

The DON RCS identifies approximately 150 permanent records series. There are permanent (and long-term temporary) paper records stored at the Washington National Records Center (a Federal Records Center operated by NARA), the National Civilian and Military Personnel Records Centers (also operated by NARA) and those that have been transferred to the National Archives. There are also permanent and long-term temporary records stored at the Naval Heritage and History Command (NHHC) and USMC History Division (USMC HD).

Finding 5: There are federal records being maintained at the Washington Navy Yard in dilapidated and deteriorating buildings.

There are buildings at the Washington Navy Yard that are dilapidated and deteriorating. The Navy is aware of this issue and there are a variety of projects for renovation that are outside the concerns of this inspection. However, there are offices within these buildings that do contain records. Some of the buildings are not fully in use, yet the records are still housed there. For example, the Director of Navy Staff - Operational Management DNS-12 has a large volume of paper Standard Navy Distribution List (SDNL) case files.

These files, which date back to the 1940s, are currently stored in a building that is in poor condition and may be scheduled for demolition or asbestos abatement. There are only a few people working in the building, most are currently teleworking. The SDNL records are secure in a vault and safe from unauthorized access. However, with the building in bad condition, the records are physically unsafe and at risk. Continued storage in this location is not recommended. The records and information are also quite valuable and should be digitized and sent to the National Archives once appropriate guidance is published by NARA. Transferring the paper and scanned copies to the National Archives would ensure historic preservation and could provide better and perhaps more widespread access.

An additional obstacle were varying restrictions on transferring physical records to WNRC due to COVID in 2020 and 2021. Records stored in Building #166 at the Washington Navy Yard, and observed by the National Archives during its inspection, are now being identified, managed, and boxed for transfer to the Navy's commercial records facility. Planning for a digitization effort is underway.

While this was only one example, there are other offices in other buildings in similar condition, and it is likely that there are other organizations that have records in poor spaces. Paper records must be relocated for safety for the records and also the safety for personnel who need to access them until reformatting is possible (36 CFR 1220.30(c)(1)). Ultimately reformatting by digitization would be beneficial for access as well as preservation.

Recommendations 5.1: The USN RO, working as necessary with the DON ARO, must remove records from dilapidated and deteriorating buildings, determine retention status and then destroy eligible temporary records, work with NARA to transfer permanent paper records prior to June 30, 2024, and/or prioritize digitization efforts once NARA issues appropriate guidance. (36 CFR 1220.30(c)(1) and OMB/NARA M-19-21 and M-23-07)

Recommendation 5.2: As an internal control, the DON/AA DRMD working with the USN must task all organizations at the Navy Yard to gather and submit information about paper records including records series, location, volume, and condition of both the building and the records. (For any found to be in poor condition, refer to Recommendation 6.1) (36 CFR 1220.30(c)(1))

PERMANENT RECORDS AND OTHER FEDERAL RECORDS WITHIN HISTORICAL COLLECTIONS AND ARCHIVES.

This report makes the following findings and recommendations specifically relating to federal records within history collections and archives of the National History and Heritage Command (NHHC) and the USMC History Division (USMC HD). There are also additional findings and recommendations for the NHHC and USMC HD under the Electronic Records Management section of this report.

Naval History and Heritage Command (NHHC)

The NHHC is an Echelon II command under operational control of the CNO and is headquartered at the Washington Navy Yard, Washington, D.C. SECNAV 5210.1 DON Records Management Manual identifies the NHHC as the primary repository for several sets of Navy records prior to their transfer to NARA, the largest of which are:

- SSIC 3000-1 Immediate Office of the Chief of Naval Operations (CNO)
- SSIC 3000-9 Operational Records/Armed Conflict
- SSIC 3000-11 Deck Logs
- SSIC 3000-18 Mobilization
- SSIC 5000-5 Navy and Marine Corps Command Histories (Navy)
- SSIC 5000-6 Historical Records and Historical Program Management (Navy)

Historically, in accordance with mandates set forth in previous versions of the DON records management manual and retention schedule, the Navy Archives also collected and now maintains a significant number of official records beyond those listed above. In addition to official records of the United States Navy, the Navy Archives collects, preserves, and provides access to personal papers, organizational papers, and other manuscript collections,

which all enrich the documentary history of the United States Navy. These records total 26,000 cubic feet of physical records as well as 1.2 terabytes of digital information.

In addition to the NHHC, OPNAVINST 5755.1A also provides Chief of Naval Operations (CNO) with the authority to create policy and procedures on the establishment, design, construction, operation, and disestablishment of United States Navy museums; to prescribe requirements for museums regarding their collections; and to set policy on the acceptance of support of United States Navy museums by recognized charitable support organizations. Within this document there are ten Naval Museums listed; however, there are many Naval bases and shipyards that also house historical collections.

USMC History Division (USMC HD)

USMC History Division's (USMC HD) primary task is to research and write the Marine Corps' official history. HD also provides reference and research assistance; preserves personal experiences and observations through oral history interviews; and deploys field historians to record history in the making.

The archives collects, preserves, and provides access to primary source documentation pertaining to the history of the United States Marine Corps. It supports Marine Corps University, the United States Marine Corps, and civilian researchers.

Materials range in dates from 1773 to the present and include a wide variety of formats. Holdings are comprised of:

- Personal papers collections of Marines of all ranks
- USMC command chronologies
- Marine Corps University materials
- Selected USMC records, documents and publications
- Maps and drawings

The authorities and procedures for the USMC HD are covered by Marine Manual: MCO 5750.1H. The issue noted previously concerning the USMC's ability to find their records in the DON RCS also impacts the USMC HD. The USMC is also housing records that it has not identified as federal records, increasing the likelihood of maintaining records longer than the RCS disposition and not transferring permanent records to the National Archives.

Finding 6: Commands are not routinely sending permanent records to the NHHC and USMC HD to retain until eligible for transfer to the National Archives as prescribed by the DON RCS.

The staff at the NHHC and USMC HD indicated that Commands are not routinely sending records as expected creating gaps in their holdings. As the official repository for certain permanent records, designated in the RCS, until they are eligible for transfer to the National Archives, it is the NHHC's responsibility to actively identify when expected records are not being transferred. It is the DON/AA DRMD's responsibility to ensure records retention schedules are implemented appropriately including the handling of permanent records. It is

essential that both entities work together to ensure Commands follow the RCS and that permanent records designated are sent to the NHHC until eligible for transfer to the National Archives.

Recommendation 6.1: The NHHC and USMC HD must identify gaps in their holdings and create a plan to identify and request that records be sent to the NHHC from those organizations required to do so. (36 CFR 1232.16 and 36 CFR 1235.48)

Recommendation 6.2: The NHHC and USMC HD staff must work with the DON ARO, USN RO, and USMC RO to create procedures to ensure records are routinely sent to the NHHC or USMC HD in accordance with the RCS (36 CFR 1232.16 and 36 CFR 1235.48)

Finding 7: The NHHC and USMC HD maintain federal records with the intention of retaining them beyond the prescribed retention periods by NARA-approved retention schedules.

36 CFR 1226.18 and 36 CFR 1226.20 specifically require and provide instructions for allowing agencies to retain records beyond their NARA-approved period under special circumstances. There are federal records covered in NARA-approved retention schedules where either the NHHC or USMC HD is identified as the repository until their final retention period expires. There are some records, particularly at the USMC HD, that are being collected and maintained regardless of the records schedule disposition such as maps from World War II, Unit records, records of defunct offices, oral histories, research and development records. There are also records that the DON intends to maintain indefinitely at the NHHC or USMC HD. In all three of these scenarios NARA should be made aware of the DON's intention to maintain these records at the NHHC or USMC HD following the regulatory procedures.

The NHHC and USMC HD are well-run history and archival collections with professional staff. The records maintained by these organizations are well managed and are not necessarily at risk. Internal and external research access is not a problem. Both facilities enjoy reputations for providing excellent reference service and can respond to Freedom of Information Act (FOIA) requests. But to be compliant with the regulations and so that NARA is aware of the desire to maintain the records within the history and archival collections, these records need to be identified and procedures for requesting to retain them followed in accordance with the CFR.

Recommendation 7.1: NHHC and USMC HD, with assistance from the respective USN and USMC ROs, must review inventories and descriptions of archival holdings for federal records to determine if current NARA-approved records schedule dispositions cite the NHHC or USMC HD as the repository for these records. (36 CFR 1222.26)

Recommendation 7.2: For any federal records in their holdings where the NHHC or USMC is not identified as a repository, the directors of the NHHC and USMC HD must request that the DON/AA DRMD update the RCS to identify the NHHC and/or USMC HD as the repository until eligible for disposition including the permanent records transfer to the National Archives. (36 CFR 1226.18 and 36 FR 1226.20)

Recommendation 7.3: The DON/AA DRMD, on behalf of the directors of the NHHC and USMC HD, must send a written request to NARA for permission to retain the records beyond their NARA approved retention or apply the retention as prescribed by the RCS. (36 CFR 1226.20)

Recommendation 7.4: The USN SRO and USMC RO must work with the DON/AA DRMD to develop a plan to schedule any federal records in these collections that are not covered by a NARA-approved retention schedule. (36 CFR 1225)

Finding 8: There is a difference of opinion between the DON/AA DRMD and the NHHC on the application of the declassification process and the needs of the NHHC

The DON/AA DRMD has a noteworthy declassification process (see a description in the Noteworthy Practices section). The NHHC has a large volume of records that require declassification in order to provide appropriate access for research and publish Navy authored histories. The NHHC needs to understand the declassification process and how to apply the results of the reviews to their holding.

Recommendation 8: The DON/AA DRMD must work with the NHHC to create and implement a plan that would resolve the conflict. (32 CFR 2001)

Finding 9: There are no intellectual, physical, or other controls for historical collections, archives, or museums at various shipyards and naval bases that could be housing federal records.

OPNAVINST 5755.1A lists officially established Navy Museums and provides Chief of Naval Operations (CNO) policy and procedures on the establishment, design, construction, operation and disestablishment of United States Navy museums; to prescribe requirements for museums regarding their collections; and to set policy on the acceptance of support of United States Navy museums by recognized charitable support organizations. However, it does not account for others.

Shipyards, naval bases, and commands also collect their own histories, memorabilia, artifacts and artwork that celebrate their individual locations or units. Many have a private foundation that supports their existence. However, it is inevitable in cases like these that federal records (some of which could be copies) will also be included. The current NHHC staff indicated that they had no authority or oversight over these collections, although there is documentation that the NHHC provided collection management guidance in the past. While each location most likely has knowledge of what their holdings are and have finding aids that help in providing access to the materials, there is no accounting of federal records and no one assigned responsibility to account for them.

Recommendation 9.1. The Director of NHHC, in coordination with the USN RO, must propose policy, instruction or procedure to the DON ARO which can then be utilized to issue guidance that assigns responsibility and accounts for federal records in history collections held by shipyards, naval bases and commands. (36 CFR 1220.34)

Recommendation 9.2. The DON/AA DRMD must issue guidance to the USN and USMC to follow instructions prescribed by 36 CFR 1226.20 for retaining records beyond the NARA-approved retention schedule found to be held in these types of collections.

Recommendation 9.3. NHHC must identify and schedule, in coordination with the DON ARO and USN RO, any federal records maintained in these types of collections that are not covered by a NARA-approved retention schedule. (36 CRS 1225.14 and 36 CFR 1225.18)

Recommendation 9.4: Where the equivalent issue exists for the USMC, the USMC RO must work with the DON ARO to implement recommendations 10.1 through 10.3 as appropriate.

OTHER DISPOSITION RISKS

Finding 10: There is a potential risk of loss of intellectual control and delays in transferring certain permanent paper records currently stored in the Washington National Records Center (WNRC).

36 CFR 1235.10 requires agencies to transfer eligible permanent records to the National Archives. The application of NARA-approved records schedules is mandatory to conduct government business, protect rights, and preserve permanent records for transfer to the National Archives of the United States. Failure to implement records schedules can lead to the loss of intellectual control of records and delays in transferring records to the National Archives. One factor driving backlogs is an older practice of mixing records with both permanent and temporary retention in the same box when transferring a Federal Records Centers (FRC). This practice is no longer accepted by NARA and was previously discouraged by NARA but was allowed at one time.

The DON has large backlogs of paper records (approximately 10,000 cubic feet) currently stored in the WNRC that are awaiting agency actions to determine the proper disposition of records. In some instances, intellectual control through inventories or other methods that help identify what records are in these boxes does not exist. DON organizations do not have the staff to review these to identify and separate the records. This issue along with some others has resulted in permanent records transfer requests to NARA from the DON to be rejected by NARA. This impasse puts permanent records at risk of not being transferred to the National Archives or being held indefinitely in an FRC or commercial records storage facility increasing storage costs.

Recommendation 10.1: The DON/AA DRMD must develop and implement a plan to address the need to identify and separate records in mixed accessions at the WNRC.

Recommendation 10.2: The DON/AA DRMD must work with NARA Research Services staff to create a mutually acceptable plan to transfer these permanent records to the National Archives.

Finding 11: Naval Special Warfare Command (NSW) does not fully distinguish Navy records from Joint Staff United States Special Operations Command (SOCOM) housed on SOCOM networks.

36 CFR 1220.34(g) requires agencies to develop records schedules for all records created and received by the agency and obtain NARA approval of the schedules prior to implementation. 36 CFR 1224.10 requires agencies to implement an effective disposition program and institute controls ensuring that all records, regardless of format or medium, are properly organized, classified or indexed, and described, and made available for use by all appropriate agency staff.

The Naval Special Warfare Command (NSW) is 80-85 percent funded by the Joint Staff (JS) United States Special Operations Command (SOCOM) as a special force. NSW utilizes the SOCOM network, and the records contained in it are a mix of Navy and SOCOM. Records ownership often is not clear between the JS and other Services like the Navy. The JS has tried to mitigate these circumstances by addressing it in USSOCOM 25-51, which states under 2(b) the Service Components are subordinate to SOCOM in an operational capacity and are to manage ‘non-specific or joint information’ in accordance with SOCOM’s dictates.

As a result, NSW is using the SOCOM record control schedule with only a reference to the DON RCS SSIC’s at the topic level and not the actual individual SSIC per record. In many cases the retention is the same; however, in other cases there are conflicting retentions. An example of primary interest is the disconnect between the JS schedule language for “contingency and conflict” records and that of the Navy records schedule as well as differing retentions for these records. The JS schedule is based on “named operations” and assigns a 25-year retention to permanent records while the Navy schedule records of crisis, contingency, or armed conflict can fall under several SSICs and involve 25-year or 50-year retention depending on the SSIC. The primary SSIC is 3000-9 and comprises records that pertain to activities, alerts, and deployments in actual or potential combat-type situations. These may include narrative accounts and other files accumulated by operating forces or other activities during crisis, contingency, or wartime operations.

In addition, the DON ARO does not have access to Navy records maintained in SOCOM record keeping systems to verify what records are in the systems, oversee disposition of Navy records, and other records management needs. During the inspection interview the NSW RM Program Coordinator indicated that providing access to the DON ARO was possible.

Recommendation 11.1: NSW should investigate with SOCOM how to utilize the Navy records system (Microsoft Office 365) so the Navy can have access and oversight of Navy records (36 CFR 1220.34)

Recommendation 11.2: The NSW Command Records Manager and RM Program Coordinator must update their crosswalk between the JS SOCOM records schedule and the DON SSIC codes to include the correct item level code. (36 CFR 1224.10)

Recommendation 11.3: The NSW Command Records Manager and RM Program Coordinator must work with the USN RO and DON ARO to determine where discrepancies exist between the DON RCS and Joint Staff RCS retention periods and ensure that the longest retention period is used to determine disposition. (36 CFR 1224.10)

ELECTRONIC RECORDS MANAGEMENT

Support for Electronic Recordkeeping

The SAORM and the Director of the DRMD indicated there is budget support to some degree for scanning operations, particularly for the declassification processes. There is also budget support for the move to Microsoft Office 365, with the DON CIO indicating support for the licensing that will be needed to maintain it. According to the DON CIO, DON CDO, and their USMC counterparts, they are hoping that the efforts for modernization including embedding records management as a routine procedure via Microsoft Office 365 will make it less of a burden. The success of this remains to be seen and does not relieve the DON/AA DRMD of its responsibilities. It is important to note that no matter what automated system is put in place records management will always require some degree of conscientious effort.

Upgrading to Microsoft Office 365 for Managing Records

On June 1, 2021, the DON began its transition into the new cloud environment called Flank Speed. This application of Microsoft Office 365 will become the required records repository. The name recognizes that the transition is the Navy's largest-ever digital transformation initiative and will set the foundation for a new modern way of working. Program Executive Office for Digital and Enterprise Services (PEO Digital) is the DON's enterprise-wide information technology acquisition agent.

Flank Speed utilizes the variety of applications and functions within Microsoft Office 365 including email, collaboration, productivity, and storage. Flank Speed is expected to be the required ERMS replacing all others once fully implemented. In addition, the Navy has approximately 415 Electronic Information Systems (EIS) listed in the DoD Information Technology Protocol Repository (DITPR). Flank Speed is also being designed to include a records management filing structure based on the SSIC codes that align to NARA-approved retention schedules replacing DON TRACKER and any existing older Records Management Applications (RMA) and electronic records management systems.

Widespread adoption of previous systems has been inconsistent. There are a variety of different systems and iterations still in use, as well as use of shared drives. Successful user acceptance and adoption of the new system will require socialization, training, situational flexibility and awareness by the DON ARO, CIO and CDO. Otherwise, it may fall victim to the same lack of acceptance and use as previous ERMS.

As referenced in this report, previous ERMS implementations include:

- Content Document Management System, 2000 - present
- Micro Focus Content Manager, 2008 – 2021 and previous iterations:
 - Total Records Information Management (TRIM)
 - Hewlett Packard (HP) Content Manager
- Department of the Navy Tasking, Records and Consolidated Knowledge Enterprise Repository (DON TRACKER) (implemented records management functionality and training in 2020), 2020-2022
- Microsoft Office 365 - 'Flank Speed' full roll out in 2023

It is also important to note that in 2015, NARA inspected limited aspects of the DON's ERM program to review the transition from TRIM (also known as HP Records Manager) to DON TRACKER⁴. NARA also reviewed the USMC deployment of Marine Corps Tool for Information Lifecycle Management (MCTILM). This transition was in early stages; therefore, the inspection report published in 2016 did not make any findings. However, it did note challenges for the DON to consider at that time. These challenges are remarkably similar to the challenges facing the current transition from DON TRACKER to Flank Speed and the concerns the DON RMs/USMC CDRMs expressed during this current inspection.

Even though the transition to Flank Speed is in its early stages, like DON TRACKER in the prior inspection, this time it is being done at an accelerated rate. Due to similar implementation issues, this inspection makes the following findings and recommendations regarding the transition.

Finding 12: Flank Speed did not have a clear strategy for the migration of records in other systems, staff awareness, user adoption, and training.

There are serious concerns related to DON Electronic Records Management Systems (ERMS) including implementation of Flank Speed and the migration of data in existing ERMS and shared drives. From the interviews with the DON TRACKER sunset team and PEO Digital staff, it was clear that the only strategy was to migrate the data as quickly as possible from various sources such as DON TRACKER and HP TRIM and set up file structures or libraries for operational units. There was an awareness that staff will need training on how to use the new system. Training efforts have begun, but a plan or timeline beyond data migration was not evident at the time of the interviews in September 2022.

In 2020, USMC initiated the original endorsement of the Microsoft Office 365 solution and continues to support it as a key stakeholder in the development, transition, and enterprise deployment of the tool. The pilots for the change to USMC Microsoft Office 365 are going well, but there doesn't appear to be a clear strategy for migrating records into the new system or for providing staff awareness and training. The concerns noted above for the Navy's Microsoft Office 365 regarding NARA's Universal Electronic Records Requirements and roll out also apply to the USMC Microsoft Office 365.

USMC development of Microsoft Office 365 is different from Navy but still managed by PEO Digital. Being a smaller organization the USMC volume of records to migrate from various systems is smaller and easier to manage. PEO Digital comprehensive strategic plans for the USMC Microsoft Office 365 were provided to the inspection team. However, plans for the roll out to staff and staff training have the same challenges noted for the Navy.

Recommendation 12.1: The PEO Digital and DON/AA DRMD must create a strategy for Flank Speed that includes timelines, staff awareness and training. (36 CFR 1220.34(f))

Recommendation 12.2: The USMC must create a formal records management transition strategy Microsoft Office 365 that includes timelines, staff awareness, and training. (36 CFR 1220.34(f))

⁴ [Department of the Navy Enterprise-Wide Electronic Records Management System Inspection Report, National Archives and Records Administration, September 15, 2016.](#)

Finding 13: Proper identification and disposition of records prior to migration from previous ERM and EIS systems to Flank Speed was not done impacting the intellectual control necessary to manage records.

According to PEO Digital, the timeline for migrating from DON TRACKER and older RMAs is accelerated. The team assigned to decommissioning DON TRACKER indicated that data was downloaded to hard drives with an inventory on what was contained on the hard drive for each export batch. At the time of the inspection, PEO Digital had not had the time to inspect more than the summary descriptions of the data. It will likely be several months before the individual record manifests can be assembled and compared to the verification data. The DON TRACKER team conducted a verification that all 71,013,459 NIPR and 5,255 SIPR records contained in the tool were exported and made available to PEO Digital. PEO Digital also indicated that they also had data that had been stored from previous systems including HP Content Manager. There was an attempt to mimic DON TRACKER for this data to assist with migration to FS. The decision to execute the migration prior to a review to apply dispositions on eligible data was based on a number of factors. DON TRACKER was due for imminent shutdown (November 1, 2022) based on the category 1 cyber vulnerabilities, integrator period of performance, the legacy data comprised a vast number of terabytes, Navy guidance requiring ‘human-in-the-loop’ review for any destruction actions, the anticipated level of effort for RMs to appraise the data, and risk of an overcomplicated export process leading to data loss. The results, while expedient, also meant migrating some records unnecessarily and retention will have to be applied retroactively. In addition, Microsoft Office 365 does not currently have the capability to manage records in place. Records currently on shared drives that have not been accounted for will have to be manually uploaded into Microsoft Office 365 by records managers once Microsoft Office 365 libraries have been established.

While DON TRACKER was recognized as the official repository for records and was to be the only authorized records management system it was not widely accepted and used. The majority if not all representatives we interviewed indicated that the system was not user friendly, did not meet their business needs, was great as a tasker system but not as one for records management. This resulted in a variety of workarounds and skeleton or pro forma use of the system, and therefore, records continued to being maintained in other systems, share drives, individual drives, SharePoint sites,

Several units we interviewed had various needs for maintaining Content Document Management Systems and/or TRIM and/or HP RM developed applications that may not be compatible with Microsoft Office 365 or could have special needs related to migration. This needs to be carefully reviewed to ensure metadata and other descriptive information are not lost. One example is from NAVSEA, where there are concerns about internet connectivity, bandwidth, and other technical issues for the FLEET when ships and submarines are at sea.

Other units also indicated that while they set up DON TRACKER per instructions, they did not consistently use it and created alternate locations including local and/or shared drives. These drives are effectively set up using SSIC codes and file naming conventions. However, because they are maintained separately or independently, migration into Microsoft Office 365 may have to be handled locally.

The USMC, being smaller, has less data to migrate than the Navy. However, once their version of Microsoft Office 365 is in place the RO and CDRMs will also have to evaluate the quality of any migrated data, the library file structures, and create training, instructions and standard operating procedures. They will also have to ensure migration of data saved on individual drives.

Recommendation 13.1: DON/AA DRMD must develop and disseminate instructions and standard operating procedures that require RMs to upload records into Flank Speed M365 that were contained in shared drives or otherwise not included in PEO Digital migration efforts and to validate their uploads. (36 CFR 1236.14)

Recommendation 13.2: When Flank Speed Microsoft Office 365 is fully operational:

- *The DON must implement the Microsoft Office 365 process for reporting records eligible for destruction to Echelon I/II RM's for their approval. (36 CFR 1220 and 36 CFR 1236.14)*
- *PEO Digital must implement a process for validating data migration and mitigating discrepancies. Any data loss that cannot be mitigated must be reported to the DON ARO. (36 CFR 1230)*

Recommendation 13.3: The USMC must issue instructions and standard operating procedures to review data migrated for discrepancies and report any losses to the DON ARO. (CFR 1236.14 and 36 CFR 1230)

Recommendation 13.4: The DON ARO must report any loss of records to NARA following procedures for reporting unauthorized disposition. (36 CFR 1230)

Finding 14: There is a potential risk of the loss of critical metadata in the planned migration to Microsoft Office 365 for both Navy History and Heritage Command and the USMC History Division (USMC HD)

Both the NHHC and USMC HD control their archival collections using versions of TRIM/HP Content Manager for inventories, location tracking, and extensive metadata fields, even though this was not the original intended use of this software. NHHC reported that the migration to Microsoft Office 365 has limitations on field structure that will cause metadata loss and interfere with the collection management and the transfer of permanent records with associated metadata to the National Archives. Similar concerns were also voiced by the USMC HD.

Navy History and Heritage Command (NHHC) Collection Management

36 CFR 1232.16 requires specific documentation to be sent with permanent records when transferred to the National Archives. For both paper and electronic records this information is part of the metadata created as part of archival processing that enables description and access. The NHHC, as stated earlier, is identified by the DON RCS as the repository for various permanent and long-term temporary records. As such a repository, it is essential that intellectual control and details captured by metadata are consistently maintained. The current NHHC collection management tool can satisfy this requirement. It enables the NHHC to have intellectual control of both paper and digital assets, track its holdings and create metadata for accessioning, finding aids, preservation needs, frequency of use, and other archival functions. According to NHHC the future Microsoft Office 365 field structure will not have enough fields to accommodate the current data.

In addition, when permanent records become eligible for transfer to the National Archives, the finding aids and metadata are required to accompany the transfer. (36 CFR 1232.16). The current field limitations of Microsoft Office 365 would not be able to capture the existing metadata. NHHC is actively coordinating with PEO to identify these limitations.

USMC History Division (HD) Collection Management

The Microsoft Office 365 migration is also a challenge for the USMC. The USMC HD implemented HP Content Manager (HP CM) for their collection inventory and management tool as a desktop thick client, storing and managing data and performing many functions independently of a network or server applications for their collection inventory and management tool. Similar to the NHHC their application has a complex field structure to capture metadata and intellectual, as well as physical control. HP CM provides broad, integrated support for the management of archives, archival processing, and production of access instruments, promotes data standardization, promotes efficiency and facilitates management of electronic records in electronic formats.

Metadata Loss

The larger issue is that the special needs of these organizations have not been taken into consideration and dismissed in the name of uniformity of application (i.e., everyone must use the same design and application created by PEO Digital). If this remains the case, a great deal of essential metadata that has taken years of painstaking work and that is basic to the function of these two archival organizations will be lost. This will curtail the ability of both organizations to provide access both internally and externally, plus complicate or inhibit the transfer of permanent records to the National Archives.

Recommendation 14: The Directors of NHHC and USMC HD, in coordination with the USN RO and USMC RO, must determine and make recommendations to the DON ARO for a solution to the migration collection management data that maintains the integrity of the inventories and metadata. (36 CFR 1232.16 and 36 CFR 1235.48)

OTHER CONCERNS

There are other concerns where a specific finding or recommendation is not necessary, but NARA is including for DON consideration

Staff interviewed could not identify permanent records or any records older than two to five years.

Other than those at the NHHC, USMC HD, and the Naval Special Warfare Command (NSW) most of the staff interviewed were unfamiliar with any records older than 2017. The response the inspection team received to - 'where are the records older' and/or 'how are permanent records identified' or 'what permanent records are being maintained' was 'I don't know' or 'none of the records are permanent'. Additional training focusing on permanent records could be helpful. Additional evaluations and inspections by both the DON/AA DRMD and NARA focusing specifically on permanent records may also be helpful.

USMC RM RO Position Needs Time and Support to Mature

While the records management program itself is firmly established, the USMC RO position as a full-time duty is newly established and needs time and support to mature. The RO needs to fully develop a relationship with the Command Designated Records Managers so that they understand the RO role and what is expected from both roles.

NOTEWORTHY PRACTICES

The DON/AA DRMD Information Portal and Ticket System

The DON ARO maintains the SharePoint portal for records management information and events that also contains a way to accept and track requests for information and/or assistance. While described earlier in this report, it is worth mentioning again in this section as a best practice. The portal and ticketing system is well designed. The ticketing system, in particular, is an interesting and efficient way to manage questions and requests for assistance for the DRMD.

Records Declassification Program

The DON/AA DRMD is responsible for the oversight of the DON's records declassification program. The declassification program retrieves documents from DON offices, both paper and electronic and, through a vendor, converts them to PDF (if they are not already in that format). Optical Character Recognition is added to enhance search capabilities. This enables declassification reviewers to review everything electronically and make appropriate notes and decisions. The decisions are then captured in the system which creates the Standard Form 715 required under the automatic declassification provisions of the Executive Order 13526 *Classified National Security Information*. There are checks and balances in the process. Multi-tier reviews for quality. It may provide standardized transfer of permanent electronic records to the National Archives. Test transfers had been done at the time of this inspection but not actual transfers.

From a records management perspective this is an interesting and notable business operation because of the protocols for scanning, the capture of metadata, and ease of access by reviewers. The process has not yet been reviewed by NARA's Information Security Oversight Office.

DON/AA DRMD Comprehensive Records Control Schedule Review

As a general practice, the DON conducts schedule reviews as new General Records Schedules are published, DoD-wide schedules are published, policy changes, or a Command submits a request for change as required by 36 CFR 1226.12(a). Outside of those routine, smaller scope reviews, DRMD conducts comprehensive reviews of the entire DON record schedule covering all schedules and all 13 chapters. DRMD determined a full review of all schedules was necessary given the amount of time since the transition to bucket schedules, the rapidly changing organizational structure, business process changes, consolidation efforts in the Navy and DoD, and the ongoing transition to meet the fully electronic recordkeeping requirements of OMB/NARA M-23-07. The goals of these efforts are to:

- Proactively identify potential problems and coordinate solutions with stakeholders
- Ensure schedules reflect current business processes
- Review for clarity and usability
- Review for best implementation of retention policies within the Navy ERMS
- Identify opportunities for consolidation

DRMD RM staff research historical and current policies and regulations, trace the schedule change history over time, generate recommended actions for any identified issues, coordinate with relevant Commands, RMs, and stakeholders, and draft schedule changes as necessary. Since 2020, DRMD has conducted these comprehensive reviews for 6 of the 13 chapters, including over 409 individual schedules. As a result, the full update submissions to NARA for chapters 1, 11, and 13 have been approved, with full updates to chapters 3 and 7 currently under review by NARA appraisal staff, and the update to chapter 5 in draft for upcoming submission.

Naval Sea Systems Command (NAVSEA) Community of Practice (COP)

NAVSEA is the largest of the US Navy's five system commands. The NAVSEA EII Records Manager established a robust and active Community of Practice (COP) in order to bring all Echelon RMs together to share information, discuss challenges, and help each other. Records Management for NAVSEA is covered by RMs at all Echelon levels from EII through EVII due to the size of the organization. The COP has web pages designed as a place for updates, changes in retention schedules. RM web pages include both public and private sites. The RMs meet regularly, usually quarterly, with a set agenda. The groups are usually separated into regional groups to account for time zones but are not limited to the group for participation. Each of the Echelon RM can also develop their own 'local' COPs if that works for them. This practice has been successful in creating the communication and collaboration necessary for a successful implementation of records management responsibilities across a large organization.

Commander Navy Installations Command (CNIC) SharePoint portal for RM information

Commander Navy Installations Command (CNIC), headquartered at the Washington Navy Yard in Washington, DC, is responsible for the operations, maintenance, and quality of life programs across 10 regions, 70 installations, and 123 Naval Operations Support Centers. There are approximately 30,000 staff members and just one RM person full time. Each installation has RM assigned as collateral duty.

The CNIC RM, to help the Echelons RMs embrace the added collateral duty, developed, and maintains a robust portal for information. The information includes DON records management program policies, instructions, the RCS as well as fact sheets she developed pertaining to the records created and maintained by CNIC. She also includes on the page information and links from other professional records management organizations to connect the Echelons to the records management profession.

USMC Command Records Operational Support Site (CROSS) Compliance Monitoring

The USMC Command Records Operational Support Site (CROSS) is a SharePoint tool designed to provide targeted support to Command Designated Records Managers (CDRMs) in the development and maintenance of a Records Management Program. When used properly, it gives CDRMs a place to note the state of each of their subordinate Section records, note discrepancies or issues, and target specific challenges. It also provides compliance information for the USMC RO and ARDB.

Each of the USMC organizations participating in this inspection discussed how they implement and use CROSS and found it to be a helpful tool. Particularly in areas where the CDRM and Section RM personnel change frequently and have limited time to dedicate to records management responsibilities, CROSS is an interesting evaluation, compliance tool and potential stabilizer.

Inspector General Evaluations of Records Management Programs

The DON/AA DRMD works closely with the DON Inspector General (IG), as does the USMC RO, to conduct evaluations of records management programs and identify areas that need improvement. The DON ARO, USN RO and USMC RO serve as subject matter experts as needed by the IG. While not unique to the DON within DoD, it is a practice worth noting.

Building relationships between a records management program and the Office of Inspector General (OIG) can benefit both programs. Connecting records management compliance with auditing procedures is a useful way to gauge the level of implementation, compliance, or engagement across an organization. Inspectors General require documentation (i.e., records) for their audits. Failures in the ability to produce documentation can be attributed to poor records management in some cases and can help records management staff identify problems. Including compliance with recordkeeping policies and procedures as part of normal routine OIG audits/reviews enables this relationship.

Naval Special Warfare (NSW) Records Management Program

Despite the challenges previously noted between the DON RCS and SOCOM RCS, the NSW has a robust records management program worth noting. Within NSW there is a Command Records Manager and RM Program Coordinator. The RM Program Coordinator is also the Command Knowledge Manager, which brings the two information management elements together. The program also works closely with the Command FOIA Officer. There is also an alignment with other information management areas including information security, privacy and content management. The desire to create a knowledge-sharing culture within and among organizations and individuals is an important driver for the NSW RM program.

What is most interesting and impressive is the systematic and comprehensive evaluations of records management implementation. The Records Manager and RM Program Coordinator with the support and under the direction of the Command Chief of Staff establish an annual records review schedule of NSW units. Department heads and office records managers (ORM) are instructed to be prepared to present evidence of embedded records management in daily processes and program management. Points that are covered include but are not limited to:

- Compliance with RM designation and training requirements
- Department level file plans
- Review of records disposition
- Review of records on file shares

The Command Records Manager and RM Program Coordinator present a comprehensive annual program review report to the Command leadership. The report contains an overall scorecard for the Command as a whole, as well as individual scorecard for each organization. The scorecard contains clear visual diagrams of the status. It includes status of prior findings, program self-assessments, inspection readiness, accomplishments, and any non-compliance with policies and/or procedures, plus the plans to make corrections. This enables Command leadership awareness of records management responsibilities and issues or challenges, which garners senior level support for the records management program and protection of the records themselves.

1st Marine Logistics Group Records Management Program Implementation

The mission of the 1st Marine Logistics Command (MLG) is to provide direct support to the Marine Expeditionary Force (MEF), Ground Combat Element. The group designates a CDRM and an assistant CDRM. While these positions are subject to the same active-duty rotation turnover as other USMC organizations, the program currently enjoys a stable and robust program. One example of a best practice is the clarity and detail in Group Order 5210.A, signed on October 24, 2022, by the Commanding Officer supplementing MCO 5210.11F (USMC RM policy and procedure). This comprehensive order establishes the Group's records management program mission and execution. Additionally, in their own words the group has taken "an aggressive approach to complying with the USMC ERM strategy". This group is an example of what an active and engaged CDRM can accomplish and hopefully leave behind for the next CDRM to build upon. While the other USMC organizations interviewed also had good practices, this group has created a more individualized program, developed a scalable and protected

document routing capability with the 1st MEF Information Management Officer to reduce paper routing and retain all command records electronically. The Group also participates with the ARDB as subject matter experts for Enterprise Support, Records Management Community of Interest, records management Proof of Concept and as records management pilot participants.

CONCLUSION

Overall, the DON Records Management Program is compliant with federal records management statutes and regulations. The program has mechanisms in place to create, maintain, protect and provide access to Naval and Marine Corps records, but there are challenges to the efficiency of the implementation of the program, as well as areas where records may be at risk. The intent of the findings and recommendations in this report is to assist the DON in the continued implementation of its records management program including the transition to more efficient electronic records management.

APPENDIX A INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well the DON 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

- Reviewed records management policies, directives, and other documentation provided by DON.
- Interviewed program staff.
- Measured compliance with federal statutes and regulations and NARA guidance.
- Reviewed responses to current and past annual Records Management Self-Assessment, Senior Agency Official for Records Management, and Federal Email Management reports.

OFFICES VISITED/INTERVIEWED

Office of the Secretary of the Navy

- Agency Records Officer and Records Management Program Office
- DON Chief Data Officer
- DON Chief Information Officer
- United States Navy Program Executive Office Manpower Logistics and Business Solutions (DON TRACKER team)
- Office of the Inspector General
- Office of Public Affairs
- Program Executive Office (PEO) Digital and Enterprise Services Naval Information Warfare Systems Command
- QualX (Vendor) in support of DON/AA DRMD
- Secretariat Historian

Chief of Naval Operations (CNO-OPNAV)

- Commander Navy Installations Command (CNIC)
- Director of Navy Staff – Records Management (DNS-16)
- Director of Navy Staff - Operational Management (DNS-12)
- Naval History and Heritage Command (NHHC)
- Naval Inspector General
- Naval Sea Systems Command (NAVSEA)
- Navy Special Warfare Command
- N4: Navy Fleet Readiness & Logistics
- N3/5: Navy Ops and Plans

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- N7: Warfighting Development
 - N8: Integration of Capabilities and Resources
 - N9: Warfare Systems

United States Marine Corps

- USMC Agency Records Officer and Records Management Program Office Staff/Contractors
- Assistant Deputy Commandant for Information
- Deputy Commandant for Information, Service Data Officer
- 1st Marines Logistics Group (MLG) Camp Pendleton, CA
- Marine Forces Central Command (MARCENT)
- Marine Corps Air Facility (MCAF) Quantico, VA
- Marine Corps Air Station (MCAS) New River, Jacksonville, NC
- History Division (USMC HD)

APPENDIX B
RELEVANT INSPECTION DOCUMENTATION

Department of Defense (DOD) or Other

- Secretary of Defense Memorandum on Official Social Media Accounts, January 2017
- Secretary of Defense Memorandum on Non-Official Electronic Messaging and Records Management, April 2016
- DOD Digital Modernization Strategy, 2019
- DOD Cloud Strategy 2018
- DOD OCONUS Cloud Strategy, May 2021
- DOD Instruction (8320.02), Sharing Data, Information and Information Technology (IT) Services in the Department of Defense, August 5, 2013, with Change I, Effective June 24, 2020
- Joint Staff/US Special Operations Command USSOCOM Directive 25-51: Information Management – Records Management, March 2020
- Department of Defense Senior Agency Official for Records Management (SAORM) Annual Reports 2013-2021

DON/AA and SECNAV

- Federal Electronic Records and Email Management Report 2021
- Records Management Self-Assessments 2015-2021
- SECNAV M-5210.1 DON Records Management Program
- SECNAV-M-5210.2: Standard Subject Identification Code Manual
- SECNAV 5210.5 File Plan November 2019
- SECNAVINST 5210.8F, March 2019
- OPNAVINST 5755.1A Navy Museums
- DON Records Control Schedules in Spreadsheet format
- DON/AA DRMD NAVIG RM Inspection Report (Summaries Samples 2019-2021)
- DON NARA Inspection Primary (RM Summary Document in response to NARA's Inspection Plan)
- DON Response re: Transition to Electronic Records, 2019
- SAORM Memorandum re: DON TRACKER Sunset Plan, August 2022
- Flank Speed Overview, May 2021
- Flank Speed Microsoft Office 365 Acceleration, March 2021
- FY 22 ERM Requirements
- Flank Speed Capstone Approach for Email Process Flow and Visualization,
- Flank Speed Microsoft Office 365 Capstone Approach for Email Records Disposition
- DON EIS Report, July 2022
- DRMD Quarterly RM sample slides
- Various samples of General RM training
- Various samples of desk references
- Sample DON TRACKER walkthroughs
- SECNAV 5210.2 ARCIS Request Form (blank)
- SECNAV 5210.4 Self-Assessment Form (blank)
- DON TRACKER Functional Requirements Document

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- DON TRACKER Executive Summary, February 2015
 - DON TRACKER Fact Sheet, December 2016
 - DON TRACKER Solution Overview PowerPoint Presentation, February 2017
 - Content Manager (CM) Records Management Application (RMA) Data Migration to DON TRACKER Guidance, May 2021
 - DON TRACKER FAQ Transition and Data Migration, June 2021
 - DON TRACKER SUNSET Memorandum, August 2022
 - DON Official Records of Departing Personnel
 - SAO Entrance and Exit Checklists
 - DON/AA/DRMD Electronic Declassification Review, PowerPoint Slides, QualX Vendor, October 2022

Naval History and Heritage Center

- History and Archives Division Policy and Procedure for Acquisitions and Accessions, December 2021
- Textual Archive Collection Policy and Acquisitions Statement, September 2020
- NHHC provided various documents describing their program and collection content management

OPNAV

- OPNAVINST 5755.1A Navy Museums
- RM Program Self Assessments for organizations included in inspection virtual or on-site interviews
- NHHC RM appointment letter as a sample

USMC

- Command Records Operational Support Site (CROSS) Slick Sheet
- Deputy Commandant for Information (DC I) – United States Marine Corps (USMC) SharePoint Online (SPO) Migration Plan
- Deputy Commandant for Information (DC I) Capstone Records Management (RM) Pilot Phase I
- Deputy Commandant for Information (DC I) Responsible, Accountable, Consulted, Informed (RACI) Matrix for USMC General Records Schedule (GRS) Records Management (RM) Proof of Concept (PoC)
- Deputy Commandant for Information (DC I) Responsible, Accountable, Consulted, Informed (RACI) Matrix for USMC General Records Schedule (GRS) Records Management (RM) Proof of Concept (PoC)
- Deputy Commandant for Information (DC I) Service Data Officer (SDO) Records Management (RM) Proof of Concept (PoC) Placemat
- Fleet Marine Forces (FMF) Org Chart
- Headquarters Marine Corps (HQMC) Org Chart
- Inspector General of the Marine Corps (IGMC) Functional Area Checklist (FAC) 5210, “Records Management,” July 25, 2022

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- Inspector General of the Marine Corps (IGMC) Inspector's Quick Reference Guide for Validation of Command Records Operational Support Site (CROSS) and Functional Area Checklist (FAC) 5210 Questions
 - Inventories of scheduled and unscheduled electronic systems
 - Marine Corps Bulletin (MCBul) 5210, "Marine Corps Transition to Electronic Records Management (ERM), March 5, 2021_Cancelled
 - Marine Corps Bulletin (MCBul) 5210, "Update to the Marine Corps Electronic Records Management Migration Plan," June 23, 2022
 - Marine Corps Microsoft 365 Records Management (RM) and Capstone Records Requirements
 - Marine Corps Order (MCO) 5210.11F, "Marine Corps Records Management Program," April 7, 2015
 - MCO 5210.11F: Marine Corps Records Management Program, April 2015
 - MCO 5750.1H: Manual for the Marine Corps Historical Program
 - National Archives and Records Administration (NARA) Monthly Status Report of Records Appraisal Activity for Department of Navy (DON)
 - NAVMC Form 10030, "Commander's Records Management Acknowledgement Agreement," June 2022
 - NAVMC Form 10030/1, "Records Management Paper Waiver Request," June 2022
 - NAVMC Form 11786, "Records Management Checklist for Departing USMC Employees," Jan 2022
 - NAVMC Form 11786, "Records Management Checklist for Departing USMC Employees," Jan 2022
 - Paper Waiver Vetting Criteria Slick Sheet for NAVMC Form 10030/1
 - Program Executive Office (PEO) Digital & Enterprise Services Microsoft Office 365 Phase 2 SharePoint Online (SPO) Migration Status Update: dated 25 Apr 2022
 - Program Executive Office (PEO) Digital & Enterprise Services Microsoft Office 365 Phase 2 SharePoint Online (SPO) Migration Status Update: dated 25 Apr 2022
 - SharePoint Online (SPO) Records Center User Guide
 - United States Marine Corps (USMC) Archives & Special Collections Branch Policy
 - United States Marine Corps (USMC) Articulate Training Slide Deck
 - United States Marine Corps (USMC) History Division, History Collections and/or Historians Document
 - United States Marine Corps (USMC) Records Management (RM) Command Records Operational Support Site (CROSS) Slide Deck
 - United States Marine Corps (USMC) Records Management (RM) Community of Interest (COI) Slide Deck
 - United States Marine Corps (USMC) Records Management (RM) Everyone's Responsibility Slide Dec
 - United States Marine Corps (USMC) Records Management (RM) Org Chart

Other Units

- Most units interviewed provided slide presentations detailing their records management program activities and/or responding to site visit agendas
 - USMC Aircraft Unit MCAF Quantico
 - USMC Aircraft Unit MCAS New River
 - OPNAV CNIC
 - OPNAV NAVSEA
 - OPNAV NHHHC
 - SECNAV (DON/AA DRMD) QualX (Vendor)
 - USMC History Division Quantico
 - OPNAV Navy Special Warfare Command Coronado
- Several units provided other documentation such as
 - 1st MEF Electronic Record Management/Document Routing Center, October 2022
 - 1st Marine Logistics Group Records Management Program SOP, October 2022
 - Naval Special Warfare Command FY22 Program Review, October 2021
 - Naval Special Warfare Command FY23 Command Records Management Program Records Review Schedule and Format instructions, September 2022
 - Naval Special Warfare Command: Knowledge Management Staff Assist Visit Schedule, September 2022
 - Naval Special Warfare Command: Joint DOTmLPPF-P Change Request (DCR) for Knowledge Management PowerPoint Slides and DOD documentation, February 2021
 - NAVSEA RM Program Overview
 - CNIC - History and Program Overview
 - USMC Aircraft Unit MCAF Quantico

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 DON 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 DON on the plan within 60 calendar days of receipt, and assist the DON in implementing recommendations.

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

APPENDIX D
ACRONYMS AND ABBREVIATIONS

ARDB	Records, Reports, Directives, and Forms Management Section
ARO	Agency Records Officer
AROC	Agency Records Officer Credential
CDO	Chief Data Officer
CDRM	Command Records Manager
CFR	Code of Federal Regulations
CIO	Chief Information Officer
CMS	Collection Management System
CNIC	Navy Installations Command
CONUS	Continental United States
COP	Community of Practice
CROSS	Command Records Operational Support Site
DITPR	DoD Information Technology Protocol Repository
DNS	Director of Navy Staff
DoD	Department of Defense
DON/AA	Department of the Navy/Assistant for Administration
DON TRACKER	Department of the Navy Tasking, Records and Consolidated Knowledge Enterprise Repository (previously known as DON TASKER)
DON	Department of the Navy
DRMD	Directives and Records Management Division
EII	Echelon II
EIS	Electronic Information System
ERA	Electronic Records Archive
ERM	Electronic Records Management
ERMS	Electronic Records Management System
FLEET	A number of warships under a single command
FOIA	Freedom of Information Act
FRC	Federal Records Center
FS	Flank Speed
HP	Hewlett Packard
HP-CM	Hewlett Packard Content Manager
HP-ERM	Hewlett Packard Electronic Records Management
HQMC	Headquarters Marine Corps
IG	Inspector General
JS	Joint Staff
KM	Knowledge Management
MCAF	Marine Corp Airfield
MCAS	Marine Corps Air Station
MCB	Marine Corps Base Camp
MCO	Marine Corps Order
MCTILM	Marine Corps Tool for Information Lifecycle Management
MFCM	Micro Focus Content Manager
NARA	National Archives and Records Administration

NAVSEA	Naval Sea Systems Command
NHHC	Navy History and Heritage Command
NSW	Navy Special Warfare Command
OCONUS	Outside the Continental United States
OIG	Office of Inspector General
OMB	Office of Management and Budget
OPNAV	Naval Operations
OPNAVINST	Chief of Naval Operations Instruction
PEO	Program Executive Office
QUALX	Vendor Name
RCS	Records Control Schedule
RM	Records Manager
RMA	Records Management Application
RO	Records Officer
SCIF	Sensitive Compartmented Information Facility
SDNL	Standard Navy Distribution Lists
SECNAV	Secretary of the Navy
SECNAVINST	Secretary of the Navy Instruction
SGML	Standard General Markup Language
SOCOM	Special Operations Command
SSIC	Standard Subject Identification Codes
TMT	Task Management System
TR	Transfer Request
TRIM	Total Records Information Management
U.S.C.	United States Code
USMC HD	Marine Corps History Division
USMC	United States Marine Corps
WNRC	Washington National Records Center



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