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Department of Defense Records Management Inspections Fiscal Years 2017 – 2021

Inspection Series Summary Report

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Department of Defense
Records Management Inspections
Fiscal Years 2017-2021
Summary 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. Under 44 United States Code (U.S.C.) 2904(c)(7) and 2906, NARA has the authority to conduct inspections or surveys of the records and records management practices of federal agencies for the purpose of providing recommendations for improvements.[1] The criteria for selecting agencies for inspection or records management (RM) program review include, but are not limited to, the results of an agency's annual records management self-assessment, the significance of certain records and the related business processes, the risk of improper management of records, and the presence of important issues that are relevant to the management of federal records in general.

In FY 2016, NARA developed in coordination with the Department of Defense (DoD) Senior Agency Official for Records Management (SAORM) and the DoD Records Coordinator a multi-year inspection plan to conduct a series of inspections of DoD component RM programs during FY's 2017-2021. The objectives of the inspections were to:

- Improve DoD's creation, identification, appraisal, scheduling, preservation, and accessioning of records, especially electronic records.
- Determine DoD's compliance with statutory mandates and RM requirements.
- Determine the effectiveness of DoD's RM policies and programs.

This summary report provides key observations of common RM challenges and risks to date for the various RM programmatic and recordkeeping requirements identified in 36 Code of Federal Regulations (CFR), Chapter XII, Subchapter B – Records Management.[2] It also provides commitments from NARA and recommendations for action by DoD to mitigate RM risks and incorporates best practices, where appropriate. Specific findings and recommendations related to all of the DoD component RM programs inspected can be found in their respective reports at on NARA's Inspection web page.

[1] 44 U.S.C. Chapter 29, *Records Management by the Archivist of the United States*
[2] 36 CFR, Chapter XII, Subchapter B – *Records Management*

The following DoD components were included in the multi-year inspection project:

- Office of the Secretary of Defense (OSD)
  - OSD RM Program
  - Defense Logistics Agency (DLA)
  - Defense Technical Information Center (DTIC)
  - Defense Information Systems Agency (DISA)
- National Guard Bureau (NGB)
  - Air National Guard (ANG)
  - Army National Guard (ARNG)
  - Joint National Guard (JNG)
- Joint Staff (JS)
  - Joint Staff Headquarters (JS)
  - Africa Command (AFRICOM)
  - Central Command (CENTCOM)
  - Cyber Command (CYBERCOM)
  - European Command (EUCOM)
  - Indo-Pacific Command (INDOPACOM)
  - Northern Command (NORTHCOM)
  - Special Operations Command (SOCOM)
  - Southern Command (SOUTHCOM)
  - Strategic Command (STRATCOM)
  - Transportation Command (TRANSCOM)
- Department of the Air Force (DAF)
- Department of the Army (Army)*
- Department of the Navy (DON)*
  - US Navy
  - US Marine Corps

* ***It is important to note that the RM inspections of the Department of the Army and the Department of the Navy, including the US Marine Corps, were originally scheduled for FY 2021. However, these inspections have been placed on hold due to the COVID-19 pandemic, and are, therefore, not included in this summary report. The planned inspections will resume in coordination with DoD and the services when normal operations return. These two individual inspection reports will be available on our website when these inspections are completed.***

The following charts provide a summary of each DoD component's compliance levels with federal statutes and regulations. Please note, "N/A" (Not Applicable) indicates that the federal requirement does not apply to the DoD component, or the requirement is covered by the component's organizational headquarters to which it is aligned. For example, the Combatant Commands (CCMD) do not create their own records schedules and use the records schedules of the JS; and the ANG and ARNG use the strategic plans of its service headquarters (i.e., the Departments of the Army and the Air Force). In addition, at the time of the inspection, CYBERCOM was recently established and developing its RM program and, therefore, it was too soon for a review by the inspection team. It is also important to note that the charts are intended

to show a summary of all RM programs, and not necessarily intended as a comparison, since the organizational missions and program resources for each DoD component vary considerably. However, they should be helpful to the DoD department records management team and the DoD SAORMs in determining where attention is the most needed.

The first chart contains the program management requirements performed at the program level to establish, manage, and oversee the RM program.

PROGRAM MANAGEMENT REQUIREMENTS:	Program Support	Strategic Planning	Policies and Directives	Records Scheduling	RM Training	RM Program Evaluations	Integration with IT
Office of the Secretary							
Office of the Secretary of Defense RM	●	◑	◕	◑	●	●	○
Defense Logistics Agency	●	◕	◕	●	●	◕	○
Defense Technical Information Center	●	●	◑	◑	◑	●	◔
Defense Information Systems Agency	●	◑	◑	◑	●	●	○
National Guard Bureau							
Air National Guard	●	N/A	●	N/A	●	◑	N/A
Army National Guard	◕	N/A	●	N/A	●	◕	N/A
Joint National Guard	◔	○	◔	○	○	○	○
Joint Chiefs of Staff							
JS Headquarters	●	◑	◑	◑	◕	◕	○
U.S. Africa Command	●	◑	●	N/A	◕	●	○
U.S. Central Command	●	●	●	N/A	●	●	●
U.S. Cyber Command	◑	N/A	N/A	N/A	◑	N/A	N/A
U.S. European Command	◕	◕	◑	N/A	◕	●	○
U.S. Indo-Pacific Command	◔	○	◑	N/A	◕	◕	○
U.S. Northern Command	●	◕	●	N/A	●	●	●
U.S. Special Operations Command	◕	◕	◑	N/A	◕	◕	○
U.S. Southern Command	◔	○	◕	N/A	●	○	○
U.S. Strategic Command	●	◕	●	N/A	●	◕	○
U.S. Transportation Command	◕	●	●	N/A	◕	◕	●
Department of the Air Force	◕	●	◑	◑	◑	◕	●

Compliance Levels			
	●	Fully	◔ Minimally
	◕	Mostly	○ Not
	◑	Partially	**N/A** Not Applicable

Figure 1: Records Management Program Requirements

The second chart contains the program implementation requirements that are executed throughout the organization in support of the RM program. The focus is on electronic records and email management, records disposition, and storage.

RECORDKEEPING AND DISPOSITION REQUIREMENTS:	Electronic Records Management	Electronic Systems Inventories	Electronic Records Internal Controls	Email Management	Permanent Records Transfers	Temporary Records Dispositions	Records Storage Areas
Office of the Secretary of Defense							
Office of the Secretary of Defense RM	◕	◑	◑	◕	◑	◑	●
Defense Logistics Agency	◑	◔	◔	●	◑	●	◑
Defense Technical Information Center	◑	◔	◔	◑	○	○	N/A
Defense Information Systems Agency	◑	◑	◔	◑	●	◑	N/A
National Guard Bureau							
Air National Guard	◑	●	◕	●	●	◑	●
Army National Guard	◑	◔	◑	◔	◑	◑	◑
Joint National Guard	◔	○	○	◑	○	○	N/A
Joint Chiefs of Staff							
JS Headquarters	◑	◑	◑	◕	●	◔	●
U.S. Africa Command	◑	◑	◑	◕	N/A	◔	N/A
U.S. Central Command	●	●	●	◕	◕	●	N/A
U.S. Cyber Command	N/A	N/A	N/A	N/A	N/A	N/A	N/A
U.S. European Command	◑	◑	◑	◕	◔	◔	N/A
U.S. Indo-Pacific Command	◑	◑	◑	◕	◔	◔	N/A
U.S. Northern Command	●	●	●	◕	N/A	●	N/A
U.S. Special Operations Command	◑	●	◑	◕	◔	◔	N/A
U.S. Southern Command	◑	◑	◑	◕	◔	◔	N/A
U.S. Strategic Command	◑	◑	◑	◕	◔	◔	N/A
U.S. Transportation Command	◑	◑	◑	◕	◔	◔	N/A
Department of the Air Force	◑	●	◑	●	●	●	●

Compliance Levels			
	●	Fully	◔ Minimally
	◕	Mostly	○ Not
	◑	Partially	**N/A** Not Applicable

Figure 2: Recordkeeping and Disposition Requirements

KEY OBSERVATIONS

The following key observations align with the RM requirements identified in the above program management and program implementation charts. Each of the twelve observations are tied to specific RM requirements. The observations are listed in the order as presented in the charts above and not the order of importance. Many of the observations are interrelated in that the lack of attention in one observation directly or indirectly affects other observations. For example, the need to update records schedules impacts the transfer of permanent records and the disposal of temporary records. The failure to dispose of temporary records in a timely manner indirectly impacts the management of electronic records and the need for better internal controls. This report presents the observations under the appropriate RM requirements and shows, where applicable, the impacts on other areas of the program.

All the observations are covered in the respective DoD inspection reports as findings with recommendations for the applicable components to address. It is important to note that all the DoD components inspected have already developed, or are in the process of developing, plans of corrective action. Improvements, in some cases, have already been made or are in progress.

PROGRAM MANAGEMENT

Program Support

The RM Programs require support from the organizational elements they serve.

Program support is critical to the success of any RM program and directly impacts the effectiveness of the program and the organization's compliance with federal mandates under 44 U.S.C. 3102, Chapter 31- Records Management by Federal Agencies.[3] Since federal records are created and managed throughout the entire DoD organization, support for the program comes from many organizational elements in the form of advocacy, delegations and designations, resources, funding, partnerships and cooperation.

The DoD components inspected excel at designating records officers (RO) (36 CFR 1220.34(a)) and establishing a network of designated RM roles throughout the components (36 CFR 1220.34(d))[4] that actively work with their RO in the management of their records. This is notable as NARA findings from other federal agency inspections often show the lack of a well-structured and fully supported RM network. Having this network in place is a vital foundational step to effectively managing records.

Support for the programs from the designated Senior Agency Officials for Records Management (SAORMs) (NARA Bulletin 2017-02) and from component senior leaders is strong with many SAORMs and component senior leaders actively engaged in the program. Partnerships between the RO and their General Counsel (GC) office, and the Freedom of Information Act (FOIA) and Privacy Act (PA) offices, where records are critical to their function, are also strong and effective. Examples of this strong support for the RM program can be found in the reports for

[3] 44 U.S.C. Chapter 31, *Records Management by Federal Agencies*,

[4] 36 CFR 1220.34 (a) and (d), *What must an agency do to carry out its records management responsibilities*

DLA, DISA, DTIC, JS, CENTCOM and NORTHCOM.

A common area of support that needs improvement in many of the components is the RO's relationship with its servicing IT office. Even though most of the component RM programs are aligned under the Office of the Chief Information Officer (OCIO), most ROs have little to no involvement in information lifecycle processes, which directly impacts the management of electronic records (36 CFR 1236)[5] in the development of information systems and the management of records on network shared drives. (See more information under the Electronic Records Management observation.) Of the 19 components inspected, four stood out as having an effective relationship with IT: the DAF, CENTCOM, NORTHCOM, and TRANSCOM. The rest require attention in this area.

RM program offices lack sufficient resources for such large organizations.

Another area of support for the RM program that needs improvement for many components is the assignment of sufficient personnel resources in the RM program office. Most of the component RM program offices have one, sometimes two, positions assigned to manage the program for large organizations with elements located throughout the United States and overseas. This has resulted in many component ROs having to prioritize which federal requirements they can accomplish and which federal requirements to set aside. Many of the program management findings and recommendations in the individual component inspection reports can be attributed to a lack of resources to fully accomplish all the requirements in 36 CFR Chapter XII, Subchapter B. The two exceptions for this area of support are DLA and the JS, both of which were fully staffed with sufficient resources.

Strategic Planning

Finalizing draft strategic plans for Records Management Programs and the comprehensive DoD RM strategic plan currently under development will increase the overall effectiveness of records management Department-wide.

Office of Management and Budget (OMB) Circular A-130 includes specific requirements related to strategic elements of RM programs that are to be included in the agency's Information Resource Management (IRM) Plan.[6] Review of the IRM plans submitted to NARA as part of this inspection series showed that records, although not specifically mentioned, are included under managing DoD information and data as a national asset.

Many of the DoD components inspected were developing new or revising old strategic plans specific to their RM programs. The need for strategic planning for records management programs is not new, but has been given increased relevance with the release of the OMB/NARA Memorandum M-19-21 in June 2019. If the plans that were under development are finalized and implemented, they will help DoD meet the deadlines in the memorandum.[7] Most of the strategic

[5] 36 CFR 1236, *Electronic Records Management*
[6] OMB Circular A-130, *Managing Information as a Strategic Resource*, July 28, 2016
[7] OMB/NARA Memorandum (M-19-21), *Transition to Electronic Records*, June 28, 2019

plans reviewed were in draft form awaiting additional guidance from NARA that addresses electronic formats and metadata, digitization, and records transfer exception procedures. In addition, the draft strategic plans for many of the components will include goals for implementing the Defense Enterprise Office Solutions (DEOS), for which more information is needed to complete the plans.[8]

At the department-level, DoD is developing a comprehensive RM strategic plan that all DoD components will use to tailor to their individual component strategic plans. Of all the RM strategic plans reviewed, the Headquarters element of the DAF had an especially good plan that other DoD components could use as a model, in addition to incorporating the goals of M-19-21.

Policies and Directives

RM policies, directives, and instructions exist with some drafts or revisions that need to be finalized.

Up-to-date RM policies, directives, and instructions are foundational elements of any RM program (36 CFR 1220.34(c)).[9] They provide the requirements, direction, and procedures needed by component staff to meet not only federal RM statutes and regulations, but also agency business needs.

DoD Instruction 5015.02 provides comprehensive direction and guidance for all aspects of an effective RM program.[10] At the department level, it is written to serve as a guide for DoD components to expand upon policies and procedures that are unique to the component. With one exception, all the components visited at the time of their inspections had current RM policies and directives or were in the process of updating their RM policies and directives ensuring they reflect the most current requirements for managing records in all formats. In addition, many of the components developed manuals and procedures to cover specific aspects of their RM programs to provide personnel with additional guidance. CENTCOM's and NORTHCOM's RM policies and directives were particularly noteworthy, providing clear details for all areas of RM.

[8] DEOS is an integrated, commercially-provided, cloud-based, enterprise commercial-off-the-shelf service being procured by DISA that offers communications, content, and RM capabilities for DoD.
[9] 36 CFR 1220.34(c), *What must an agency do to carry out its records management responsibilities*
[10] DoDI 5015.02, *DoD Records Management Program*, February 24, 2015

Policies relating to the role of the Historian and the relationship with Records Management need to be clarified.

Many agencies across the federal government establish history collections and Historian Offices. For example, the Historical Office of the Office of the Secretary of Defense dates to 1949 and has been recognized for its publications and programs. This office has a very close working relationship with the OSD Records Officer that ensures the necessary internal controls and responsibilities of records disposition of the RO are adhered to, including the transfer of permanent records to the National Archives. However, this is not the case in all components that have History Offices. In one case, the roles and responsibilities of the Historian and the RO overlapped, and the component's directive conflicted with the RM directive of its higher headquarters. NARA recommends the Department and components review their information governance structure, including relevant policies and directives, and the roles and responsibilities between the component RM program and the component History programs. The directives for OSD, JS, and CENTCOM contain good examples of the Historian's role and responsibilities that can be used as a guide for other components.

Records Scheduling

Many records schedules do not meet current business needs, require updating, and do not include many of the electronic information systems containing records.

Current records schedules are not just a regulatory requirement as required by 36 CFR 1225. They also serve as the foundation for any records management program.[11] They enable agencies to enact the legal authority approved by the Archivist of the United States to properly dispose of temporary records and to transfer permanent records to the National Archives (36 CFR 1226).[12]

Several of the components, at the time of the inspections, had records schedules dating back to the 1990s and earlier, and many had records in electronic systems that did not have approved records schedules. It is notable that all the components, except the NGB, were actively working with their assigned NARA appraisal archivists to update their records schedules. It is important to point out that, in many cases, components do not work directly with NARA to schedule records, but do work with their higher-headquarters RO, providing valuable input for the records of the component. This applies to the ANG and ARNG, which submit their scheduling needs to their respective service RO, and the CCMDs that submit inputs to the JS RO.

To create a firm foundation, components need to review their old records schedules to ensure the records schedules are current and that the retention periods meet current business needs (36 CFR 1224.10(c)).[13] It was found that many of the program offices in the components were keeping records much longer than the approved retention in their schedules because they believed the retention was insufficient. (See Permanent Records Transfers and Temporary Records Dispositions observations.) Component IT offices, and/or system program management offices,

[11] 36 CFR 1225, *Scheduling Records*
[12] 36 CFR 1226, *Implementing Disposition*
[13] 36 CFR 1220.10(c), *What must agencies do to implement an effective records disposition program*

also need to work with their RO to schedule electronic systems (NARA Bulletin 2010-02).[14] While some component ROs had records schedules for electronic systems that they were aware of, none of the ROs, except for the DAF, had a complete inventory of all electronic systems used in their component. (See Electronic Systems Inventories observation.)

RM Training

Overall, RM training at most of the components is good, but access to RM training in some components is limited.

Federal regulations require agencies to provide records management guidance and training to all personnel (36 CFR 1220.34(f)).[15] NARA Bulletin 2017-01: *Agency Records Management Training Requirements* requires all staff, contractors, and volunteers to take annual RM training specific to the agency.[16] The bulletin also recommends, as a best practice, the development and implementation of role-based RM training.

RM training at most of the components is generally compliant. Almost all the components require all personnel to receive RM training annually, and all the components have excellent role-based training for personnel with various RM responsibilities. Many of the RM training materials, especially DLA's and NORTHCOM's RM training, are examples for other federal agencies to use as a model.

However, access to the RM training in some components needs improvement. This applies mainly to the components that have offices overseas with limited access to the systems in which the RM training is hosted. Specifically, Offices of Military Cooperation, Offices of Defense Cooperation, and Defense Courier Stations have challenges accessing the DoD portals that host the RM training. To overcome this challenge, some components provide RM training during a staff assistance visit when funding is made available, or download and send the RM training materials to the unit for completion. The high turnover of personnel, however, at those locations have made it difficult to meet this requirement.

[14] NARA Bulletin 2010-02: *Continuing Agency Responsibilities for Scheduling Electronic Records*
[15] 36 CFR 1220.34(f), *What must an agency do to carry out its records management responsibilities*
[16] NARA Bulletin 2017-01: *Agency Records Management Training Requirements*

RM Evaluations

Most of the components conduct regular, formal comprehensive RM inspections, evaluations, assessments or audits, but lack the follow through required to make improvements.

Effective evaluations are an important part of any RM program. Comprehensive evaluations are essential to measure the adequacy and effectiveness of agency RM policies, procedures, and guidance and ensure that programs comply with federal regulations (36 CFR 1220.34(j)).[17]

Many of the components inspected demonstrated a systematic process for conducting formal, comprehensive RM reviews or assessments using a variety of methods and partnerships. These include formal evaluations with written results and corrective action plans, staff assistance visits, the use of management audit tools, and partnerships with the Office of the Inspector General (OIG). Of the components visited, OSD, DTIC, DISA, AFRICOM, CENTCOM, EUCOM, and NORTHCOM have effective RM evaluations or assessments. OSD's, DTIC's, and NORTHCOM's evaluations, in particular, serve as a best practice for many federal agencies to adapt.

Many of the other components also conduct formal evaluations or assessment, but fall short in one of three areas: the lack of written results and/or corrective action plans; access to the results when the evaluations are performed by the OIG or the results are in a management audit system; or the inability to travel to component units not located at the component headquarters due to lack of funding. For the components affected by this, the evaluations can be more effective if the results are documented and monitored for improvements, the results are easier to access if the evaluation is conducted by another entity, and if funding is made available to reach all units of the component.

Of the 19 components inspected, only two were not conducting any form of evaluation or assessment of their RM program. Without any kind of evaluation, these components are unable to determine the effectiveness of their policies, procedures, and internal controls, and cannot identify, mitigate, or prevent risks to the components' records.

[17] 36 CFR 1220.34(j), *What must an agency do to carry out its records management responsibilities*

Integration with IT

Integration of RM with IT and the information lifecycle is lacking and inhibits recordkeeping functionality.

Of all the RM requirements, the integration of RM and preservation considerations into the design, development, enhancement, and implementation of electronic information systems (EIS), as required by 36 CFR 1236.6(b), OMB Circular A-130, and DoDI 5015.02, needs the most improvement.[18] This requirement also includes the migration of information and data from legacy systems into new EIS, and applies to all EIS that contain records, not just records management applications (RMA) and electronic records management systems (ERMS).

Except for the DAF, CENTCOM, NORTHCOM, and TRANSCOM, the inspection teams found that most component ROs are not involved in the information lifecycle processes for the systems used in their components. Many of the ROs learned of new systems they were previously unaware of as they accompanied the inspection teams on visits to program offices within their organization. The lack of RO involvement prevents the RO from creating and implementing records schedules for the records in the systems. This, by law, requires the component to keep the electronic records permanently even after the systems are replaced or decommissioned until an approved records schedule is issued. Without the RO involvement, components are not likely to know that these records are unscheduled and will most likely not know that they must be kept as permanent until a schedule exists. This also raises the risk that the unscheduled electronic records will be mismanaged, lost or disposed of without authorization, opening up the component to potential lawsuits, business inefficiencies, and negative public attention. In addition, there is a risk that the systems may be designed in ways that create or maintain records incorrectly requiring expensive modifications.

Of the four exceptions, the DAF established the most effective practice by integrating RM into, and giving the RO access to, its Information Technology Investment Portfolio Suite (ITIPS). The ITIPS registry enables the RO to track the full lifecycle of all DAF systems with milestones built into the process, including RM that must be accomplished before systems become operational.

[18] 36 CFR1236.6(b), *What are agency responsibilities for electronic records management*.

PROGRAM IMPLEMENTATION

Electronic Records Management

There are difficulties with managing electronic records on shared drives or SharePoint Portals with or without a fully configured electronic recordkeeping system.

The management of electronic records in nearly all the components visited is particularly challenging. A number of the components visited had implemented or were implementing an electronic recordkeeping system to meet the goals of M-19-21 and to gain better control of its electronic records. In the case of OSD, five recordkeeping systems were found to be in use by OSD alone. In all cases where a recordkeeping system was implemented, the components followed, for the most part, the requirements in 36 CFR 1236, Subpart B, and the Universal Electronic Records Management (ERM) Requirements issued by NARA.[19]

Some components were more successful in configuring their recordkeeping system and implementing controls to minimize the manual tasks performed by component personnel. This was found at DLA, CENTCOM, NORTHCOM, and two of the OSD components: the Directives Division of the Washington Headquarters Service (WHS), and the Defense POW/MIA Accounting Agency (DPAA). Some components using recordkeeping systems had different levels of configuration, which still required varying levels of manual tasks performed by personnel to move the records into the recordkeeping system.

The area of difficulty many of the components experienced was with electronic records being created and maintained temporarily outside the recordkeeping systems on shared network drives or in SharePoint prior to moving the electronic records into the recordkeeping systems. For the components that did not implement a recordkeeping system, the electronic records were more difficult to manage as they remained on shared drives or in SharePoint for the records' entire lifecycle. This was especially true for the components that did not establish internal controls to protect the records and/or prevent unauthorized disposals. (See Internal Controls)

To address this area, DoD plans to deploy across the department the Defense Enterprise Office Solutions (DEOS) that is supposed to include all the RM capabilities needed to manage electronic records effectively and compliantly. The success of the DEOS deployment is of great interest to DoD and NARA, and as an enterprise-wide example for other federal agencies.

[19] 36 CFR 1236, Subpart B, *Records Management and Preservation Considerations for Designing and Implementing Electronic Information Systems* and *Universal Electronic Records Management Requirements*

Electronic Systems Inventories

There are gaps in the inventories of electronic systems due to the lack of the ability of the component ROs to access the Defense Information Technology Portfolio Repository (DITPR), and other struggles related to maintaining inventories of systems that are not included in DITPR.

36 CFR 1236.26 requires federal agencies to maintain inventories of electronic information systems, and NARA Bulletin 2010-02 requires federal agencies to schedule electronic systems using this inventory as a source for the RO to schedule electronic records.[20]

Component ROs play an important role assisting IT portfolio managers and functional managers of electronic systems with managing the information, data, and records in DoD systems. They help determine and seek approval from NARA for the retention of electronic records in the information systems (see Records Scheduling observation). This contributes to the more efficient management of the information in the system, reduces costs, minimizes duplication, and provides better and timely processing of legal and FOIA matters. To perform this critical function, ROs need access to a complete inventory of the component's electronic systems.

Within DoD, all components use the Defense Information Technology Portfolio Repository (DITPR) as a source of information for all major DoD information systems. During the inspections, however, it was observed that many component ROs did not have access to DITPR and that requests for a copy of the component's systems in DITPR were ignored. Many ROs spent a lot of time developing their own inventory, but found it difficult to maintain as systems changed, were replaced, or decommissioned. Only one component RO visited had access to DITPR, but found it did not contain information for all the component's systems – only its major systems. To fill the gap, the RO relied on System of Records Notices and Privacy Information Assessments to identify other information systems, and relied heavily on system program managers to keep informed of changes to their systems. This is not efficient and risks failure to contain and/or control the records and ensure systems are scheduled.

Of all the components visited, the DAF had the best practice that would benefit other DoD components, partnering with Portfolio Managers and having direct access to its ITIPS system.

[20] 36 CFR 1236.6, *What actions must agencies take to maintain electronic information systems*

Internal Controls

There is a lack of internal controls for managing electronic records on shared drives, personal drives, or SharePoint Portals.

36 CFR 1220.30(c)(1) and 1220.34(i) requires agencies to develop and institute effective controls over the creation, maintenance, and use of records in the conduct of current business; and that the records, regardless of format or medium, are properly organized, classified or indexed, described, and made available for use by all appropriate agency staff.[21]

Instituting controls for electronic records on shared drives, personal drives, and SharePoint portals is critical for ensuring that electronic records are protected and made available when needed. This is especially challenging when a recordkeeping system has not been implemented, and where many of the challenges that may seem common, are difficult for some components due to mission, infrastructure, and other unique requirements. Recognizing the need for many federal agencies, NARA provided additional guidance in NARA Bulletin 2012-02: *Guidance on Managing Content on Shared Drives*.[22]

During the inspections, it was observed that all the components use shared drives and SharePoint, with one component also using personal drives, to store electronic records either temporarily before moving the records to a recordkeeping system, or for the entire lifecycle of the records. It was also noted that very few components had established controls to prevent accidental deletion of records, duplication, and/or the migration of electronic records without prior notification to the records users.

While the need for internal controls for managing electronic records was evident during most of the inspections, there were some noteworthy controls and initiatives in place by some components that may be of benefit to other components:

- NORTHCOM reduced the number of shared drives used throughout the Command to only one drive that is regularly reviewed and used to prepare records before moving the electronic records into their recordkeeping system.
- OSD established a separate shared drive specifically for personal storage tables (PST) files for electronic mail records to enable backup and recovery and prevent the loss of email, and to prevent the use of personal drives.
- The DAF designated one official drive for records storage and developed detailed policies, procedures, and controls to protect and manage their electronic records until a recordkeeping system is implemented.
- Joint Base San Antonio (part of the DAF inspection) instituted quarterly audits of SharePoint libraries to reduce storage and force the proper filing of electronic records.

[21] 36 CFR 1220.30(c)(1), *What are an agency's records management responsibilities* and
36 CFR 1224.34(i), *What must an agency do to carry out its records management responsibilities*
[22] NARA Bulletin 2012-02: *Guidance on Managing Content on Shared Drives*

- SOCOM was working with their Knowledge Managers to develop artificial intelligence algorithms that scanned shared drives to identify duplicate records and records not used in years.

Email Management

Management of both Capstone and non-Capstone email remains challenging. Defense Enterprise Email (DEE) has limited RM capabilities and will not be upgraded to include many of the needed RM requirements to manage email efficiently.

Having an approved schedule in place for email is necessary for managing email, but the implementation of the schedule is essential for appropriately managing and dispositioning both permanent and temporary email. Many, but not all, of the components visited had a NARA-approved Capstone schedule in place with policies for managing non-Capstone officials' email.[23] The CCMDs at the time of their inspections were in the process of seeking approval and already had policies and procedures implemented to manage their email.

Most of the DoD components use Defense Enterprise Email (DEE), which has limited RM capabilities and will not be upgraded to include many of the needed RM requirements to efficiently manage email. DEE does have journaling capability, which is widely used for the management of Capstone officials' email. But this capability is not practical and is very costly for managing the temporary email of non-Capstone officials. In addition, many of the components reported a number of issues involving limited storage for email accounts forcing users to create and store PST files that need to be managed. Other issues involved the retrieval, tagging, and encryption of emails that directly impact the components' ability to search and find discoverable email records to respond to litigation and FOIA requests.

Many of the issues observed by the NARA inspection teams may be addressed with the deployment of DEOS across DoD to better manage email records and minimize the risks currently being experienced in the components.

Permanent Records Transfers

Permanent records, especially permanent electronic records, are not consistently transferred to the National Archives when eligible.

Of the twelve areas of observation in this report, the lack of transfers of permanent records to the National Archives (36 CFR 1235), especially permanent electronic records, was found most often.[24]

With few exceptions, most of the components regularly transfer some permanent paper records to the National Archives. Almost all of the component ROs use NARA's Federal Records Centers (FRC) to store their paper records, allowing NARA to assist with the transfer of permanent records as part of NARA's Annual Move program.[25] Reasons indicated why

[23] NARA Bulletin 2013-02: *Guidance on a New Approach to Managing Email Records*
[24] 36 CFR 1235, *Transfer of Records to the National Archives of the United States*.
[25] NARA's Federal Records Management, *Annual Move*

permanent paper records were sometimes not transferred include: program offices in the large components did not always turn over records to the RO, the lack of a records schedule, and records schedules did not meet business needs (see Records Scheduling). In some cases where schedules did exist, program offices had concerns with national security, declassification, or just did not want to transfer the records.

The lack of transferring permanent electronic records, however, was more prevalent and needs to be addressed. Although some of the same issues and concerns apply with permanent paper records, the transfer of electronic permanent records is more complex involving technical issues, such as the mechanism for transferring large volumes of records, and the format and metadata requirements for electronic records. NARA acknowledges that the volume transfer limitations of the Electronic Records Archives (ERA) system had an impact on transferring permanent electronic records, and that clearer format and metadata guidance was needed. Since these issues were identified, NARA has taken action to increase the volume transfer capability in ERA and has issued or revised bulletins providing clearer guidance.[26]

In addition, just as NARA assigns appraisal archivists to each agency to process agency records schedules and assigns FRC Account Managers to manage agency records in FRCs, NARA also assigns accessioning archivists for each agency, for both textual (paper) and electronic records. The accessioning archivists do provide specific guidance and valuable assistance to agencies as needed with the transfer of permanent records, in addition to the general guidance published on NARA's website.[27]

Temporary Records Disposals

The disposition instructions of temporary records are not regularly applied.

During the inspections, it was observed that most of the components do not regularly dispose of their temporary records (36 CFR 1226.10).[28] In many cases, the temporary records were kept on shared drives and in SharePoint, which made it more difficult to manage electronic records and emphasized the need for stricter controls (see Electronic Records Management and Internal Controls observations). In some cases, multiple versions of records and duplicate records were found making it difficult to manage the records electronically and impacting the volume and timely response for legal and FOIA searches.

At the DAF, annual disposal of temporary records is conducted of its designated records drive which contributes to better management of its temporary electronic records. The most effective practice found is NORTHCOM's designation of Disposition Validation Officers with detailed procedures and forms developed to regularly conduct the disposition of all records, both temporary and permanent. This designation and process directly contributes to the Command's ability to effectively manage its electronic records electronically meeting the goals of M-19-21,

[26] NARA Bulletin 2015-04: *Metadata Guidance for the Transfer of Permanent Electronic Records* and NARA Bulletin 2018-01: *Updating NARA Bulletin 2014-04, Format Guidance for the Transfer of Permanent Electronic Records*

[27] NARA's Federal Records Management, *Accessioning Electronic Records* and *Accessioning Textual Records*

[28] 36 CFR 1226.10, *Must agencies apply approved schedules to their records*

and to find accurate and relevant information when needed in a timely and efficient manner.

Records Storage Areas

With some exceptions, most of the records storage facilities visited were in good condition, well organized, and managed effectively.

Within DoD, records storage facilities and records storage areas are commonly used to store inactive paper records. Some components visited, such as the DAF, ANG, and ARNG, have large records storage facilities at many of their installations, while other components had designated records storage areas within their main facility.

The storage facilities for the most part, were in good condition (36 CFR 1234), except for one component where safety concerns were raised.[29] The organization and management of records in the records storage facilities at Robins Air Force Base (AFB), Scott AFB, and Joint Base San Antonio were particularly good, as well as the records storage area managed by the JS. One other component visited did have some organization and coordination issues, which have already been corrected as part of their plan of corrective action.

The inspection teams also noted that the volume of inactive paper records in these storage facilities and areas is diminishing, as most of DoD's records are created and managed electronically. Many of the installations in the DAF, at the time of their inspection, had launched digitization projects funded by their host base Communications Groups and Squadrons to eliminate their storage facilities. The Air Force Reserve Command, in particular, had completely digitized all of their inactive records at Air Force Reserve installations and made the records available on their network to the respective Reserve bases and units. Many of the DoD components visited were also actively working with their FRC account managers to determine the disposition of their records currently in FRCs, and to determine their future requirements for storage as part of M-19-21.

[29] 36 CFR 1234, *Facility Standards for Records Storage Facilities*

CONCLUSION

This summary report of DoD inspections focuses on broad federal RM requirements that all agencies are required to follow. During the inspections, particular emphasis was placed on the management of electronic records where many of the challenges exist. The report also summarizes the common challenges and risks observed that should be useful to other DoD components and federal agencies.

As noted in this summary, DoD components are experiencing RM challenges, but they are also experiencing successes. In each of the individual inspection reports, many components have noteworthy practices that are summarized above, and can be shared internally within DoD to help other components improve their RM programs. In addition, all the DoD components inspected have developed, or are developing, plans of corrective action with actions and milestones to address their respective recommendations. The corrective actions taken in those plans of corrective action are also worth sharing internally within DoD to assist other DoD components with reducing risks to DoD's records, strengthening compliance with federal requirements, and better contributing to the Department's missions.

RECOMMENDATIONS FOR EXECUTIVE ACTION

Based on the observations and data collected by the NARA inspection teams, this report makes the following commitments for action by NARA and recommendations for DoD agencies.

What NARA will do:

- Have policies and processes in place to support the transition to fully electronic recordkeeping.
- Continue efforts to provide policy and guidance for ERM.
- Enhance support for RM officials with effective policies, modern tools, and new services to support the transition to electronic records.
- Develop federal RM requirements and work with federal and commercial vendors to incorporate the requirements into software applications and cloud offerings.
- Provide reasonable and independent assurance that agencies are complying with relevant laws and regulations.
- Establish appraisal and scheduling processes that reflect modern electronic records management.
- Redesign RM training to build an RM workforce that is skilled in electronic records and data management.
- Provide policy and guidance on the creation and maintenance of RM directives and policies.

What DoD agencies must/should do:

The following general recommendations, if addressed, will improve the management of records in DoD components:[30]

- Increase support for the RM program from organizational elements as needed.
- Finalize and distribute the comprehensive DoD RM strategic plan.
- Finalize and distribute component RM policies and directives.
- Review and revise records schedules, and schedule unscheduled records including records in electronic information systems.
- Improve access to RM training.
- Document RM evaluation results and corrective action plans, improve access to the results, and provide funding to evaluate units at remote locations.
- Better integrate RM into IT processes.
- Improve the management of electronic records not maintained in recordkeeping systems.
- Improve access to inventories of electronic information systems.
- Establish and institute internal controls to improve the management of electronic records on shared drives and in SharePoint.
- Develop common procedures to improve the management of temporary email.

[30] For specific and more comprehensive recommendations per each component, see the individual component reports.

- Identify and transfer permanent electronic records eligible for transfer to the National Archives.
- Regularly dispose of temporary electronic records.
- Improve safety conditions in records storage facilities/areas, where needed.
- Share information on challenges and best practices where appropriate to do so.

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